

Appendix A

Type of Penalty Amount Indicator (EAMTTYP)

Type of Penalty Amount Indicator (EAMTTYP) values:

For 100 Series Enforcement Action Types:

No penalties should be associated with this type of enforcement action series.

For 200 Series Enforcement Action Types:

PA Proposed Monetary Penalty. The amount of the total penalty in dollars proposed in an initial enforcement action.

FA Final Monetary Penalty. The amount of the total penalty in dollars a handler named in an enforcement action must pay directly to the responsible agency.

For 300 Series Action Types:

FA Final Monetary Penalty. The amount of the total penalty in dollars a handler named in an enforcement action must pay directly to the responsible agency (for consent agreements with SEP, this is exclusive of SEP credits).

FC Final SEP Cost. The final amount cited in an enforcement action as the cost in dollars to the handler of a supplement environmental project.

CR Final SEP Credit. The credit in dollars allowed by the agency for the completed SEP and applied towards the total final settlement amount.

For 400 Series Enforcement Action Types:

PA Proposed Monetary Penalty. The amount of the total penalty in dollars credits, proposed in an initial enforcement action.

For 500 and 700 Enforcement Action Types:

FA Final Monetary Penalty. The amount of the total penalty in dollars a handler named in an enforcement action must pay directly to the responsible agency.

For 600 Enforcement Action Types:

FA Final Monetary Penalty. The amount of the total penalty in dollars a handler named in an enforcement action must pay directly to the responsible agency.

FC Final SEP Cost. The final amount cited in an enforcement action as the cost in dollars to the handler of a supplement environmental project.

CR Final SEP Credit. The credit in dollars allowed by the agency for the completed SEP and applied towards the total final settlement amount.

For 800 Enforcement Action Types:

No penalties should be associated with this type of enforcement action series.

Appendix B

Type of Enforcement Action (ENFTYP)

Type of Enforcement Action (ENFTYP) values:

The types of actions are coded in a 'pyramid' scheme in which each digit number is significant. Thus the first number designates the Series level. The 100 Series refers to informal administrative actions, the 200 Series initial formal administrative actions, etc. The second digit provides more specific information on the type of enforcement action taken. The last digit is unassigned and is available for further delineation by the implementer. At a minimum the enumerated enforcement actions below must be reported. Only the first and second digits flow to oversight. The third digit at the oversight level is always zero. Only the series listed below are compressed to go to National Oversight.

100 Series Informal Administrative Actions

- 110 Verbal Informal
- 120 Written Informal
- 190 Combination of above

200 Series Initial Formal Administrative Actions

- 210 3008(a) Compliance Order
- 220 Imminent Hazard Order
- 230 Monitoring, Analysis and Testing Order
- 240 3008(h) Interim Status Corrective Action Orders (only for non-HSWA violations)
- 250 Notice of Non-compliance (federal facilities only)
- 290 Combination of above

300 Series Final Formal Administrative Actions

- 310 3008(a) Compliance Order
- 320 Imminent Hazard Order
- 330 Monitoring, Analysis and Testing Order
- 340 3008(h) Interim Status Corrective Action Orders (only for non-HSWA violations)
- 350 Federal Facility Compliance Agreement
- 360 CERCLA 106 Order
- 370 CERCLA 104 Order
- 390 Combination of above

500 Series Civil Actions

- 510 Civil Action for Compliance
- 520 Civil Action for Imminent Hazards
- 530 Civil Actions to Compel Compliance with Previously issued actions
- 540 Civil Action for interim corrective action

- 550 Civil Action for Monetary Penalties
- 590 Combination of above civil actions

600 Series Final Judicial Actions

- 610 Consent Decrees
- 620 Judicial Orders

800 Series Administrative Referrals

- 810 State to EPA
- 820 EPA to State
- 830 EPA RCRA to EPA CERCLA
- 850 Federal Facility Referral to EPA HQ
- 890 Combination of above administrative referrals. These are always enforcement sensitive codes which will never be released.

400 Series Judicial Referrals

- 410 Referral to AG
- 420 Referral to DOJ
- 430 Referral to District Attorney or City Attorney
- 490 Combination of above judicial referrals

The following are enforcement sensitive codes that will only be released if they have had a final monetary penalty (EAMTTYP = FA).

700 Series Criminal Actions

- 710 Criminal Actions

Appendix C

Type of Evaluation (ETYPE)

Type of Evaluation (ETYPE) values:

CAO An on-site inspection of Corrective Action activities. When corrective action on-site inspection is conducted as part of another inspection type (CEI, CME, etc.), a separate Handler Evaluation form should be submitted reporting the CAO component.

CAV Compliance Assistance Activity. Assists in tracking and verifying that a Handler has self-disclosed the existence of a violation and/or performed an audit and has submitted the information as appropriate to the State or EPA.

CDI Case Development Inspection. A CDI may involve sampling to confirm the chemical composition/characteristics of wastes handled by generators and transporters, and their waste handling practices. In addition, facility operations and design information may be reviewed, and manifests from generators and transporters verified. A focused CDI may be conducted when a CEI reveals possible RCRA violations, and could serve to gather the additional data needed to support an enforcement case.

CEI Compliance Evaluation Inspection. Is primarily an on-site evaluation of the compliance status of the handler with regard to all applicable RCRA Regulations and Permits. Although portions of a CEI evaluation may routinely be conducted in an agency office setting, such "office" evaluations are considered as integral parts of the CEI in terms of the evaluation completion date. The major function of the CEI is overall review of the Handler's performance. All treatment, storage, and disposal facilities receive this type of inspection either annually or biannually. The inspection includes an on-site examination of records and other documents maintained by the handler and an evaluation of the handler's compliance with all applicable requirements and adequate sampling (use CES for CEIs without adequate sampling). Where appropriate, it includes groundwater monitoring assessment outlines or plans, closure/post-closure plans, contingency plan reviews, waste analysis plan reviews, and preparedness and prevention plan reviews. Specifically excluded from the CEI type of evaluation are Financial Record Reviews. This review is most often conducted by "agency experts", and appropriately coded as Financial Record Review (FRR) type of evaluation.

CES Compliance Evaluation Inspection Without Sampling. The CES type of evaluation indicates that the CEI was conducted without sampling. (Used by implementers who conduct CEIs through two separate site visits; one to do sampling and the other to complete the remainder of the CEI i.e., CEI = CES + SPL).

CME Compliance (Groundwater) Monitoring Evaluation. A detailed evaluation of the adequacy of the design and operation of a facility's groundwater monitoring system as per EPA's Final RCRA Compliance Groundwater Monitoring Evaluation Guidance Document. Evaluation of the groundwater monitoring system design should be conducted by a hydro geologist and includes the review of the owner/operator's (o/o's) characterization of the hydro geology beneath hazardous waste management units, monitoring well placement and depth/spacing, and well design and construction. It is essential that the CME ensure that the o/o has designed an adequate groundwater monitoring system. In addition, an integral part of the CME is the review of the operation of the groundwater monitoring system through an evaluation of the o/o's sampling and analysis plan and its implementation. CMEs should be scheduled, to the maximum extent possible, to coincide with o/o sampling events to permit the field evaluation of sampling techniques. Inspectors should collect splits or conduct EPA/State sampling as a random check of groundwater quality data at any wells which may have indicated releases to support enforcement of corrective action. A comparison of EPA/State and o/o analytical results can be used to assess laboratory accuracy and establish the reliability of o/o submitted data. A CME should encompass everything covered in the CEI for groundwater monitoring facilities. In addition CMEs should include:

- a) a detailed investigation of the engineering features and effectiveness of the groundwater monitoring system;
- b) a detailed review of the facility's groundwater sampling and analysis plan;
- c) re-calculation of statistics at detection monitoring facilities to ensure that the facility should not be in assessment;
- d) detailed examination of the facility's assessment monitoring plan and field implementation;
- e) re-evaluation of groundwater flow direction; and
- f) a substantial amount of sampling.

CMS Compliance (Groundwater) Monitoring Evaluation Without Sampling. The CMS type of evaluation indicates that the CME was conducted without a substantial amount of sampling. (Used by implementers who conduct CMEs through two separate site visits; one to do sampling and the other to complete the rest of the CME; i.e., CME = CMS + SPL). CSE Compliance Schedule Evaluation. An on-site inspection or other re-evaluation conducted to verify compliance with enforcement actions resulting from a previous evaluation, or to review deficiencies noted in previous inspection. It may be a re-review of the adequacy of documents such as closure plans or financial instruments previously found to be absent or deficient for which no enforcement action has been taken. A Compliance Schedule Evaluation should only be used if the effort involved, or

the extent of areas inspected, are insufficient to qualify as one of the more comprehensive evaluation types listed above.

FRR Financial Record Review. An extensive detailed review of a handler's compliance with financial responsibility requirements. Financial Record Reviews are conducted in the Agency office and not on-site.

FSD Facility Self Disclosure. An audit conducted by the handler.

LBN An inspection of land disposal restriction requirements. Where Land-Ban is inspected in conjunction with another inspection type (CEI, CME, etc.), a separate Handler Evaluation form should be submitted reporting the Land-Ban component.

NRR Non-financial Record Review. An evaluation conducted in the Agency office involving a detailed review of non-financial records.

OAM Operation and Maintenance Inspection. The Operation and Maintenance Inspection is a periodic inspection of how well a groundwater monitoring system continues to function once it is considered well designed. The inspection focuses on the condition of wells and sampling devices. Evaluation of well recovery notes, turbidity of water, total depth, depth to water, etc. should be made and compared to historic data. Sampling devices should be tested and if necessary pulled and visually inspected. The findings of an O&M inspection will indicate whether case development is warranted and/or will serve to focus future CMEs. The inspector should be experienced in evaluation of groundwater monitoring systems, e.g., hydrogeologist. This inspection can include sampling. However, if a great deal of sampling is conducted, a separate sampling inspection should be recorded.

OTH Other Evaluation. Any type of evaluation other than those listed above.

SNN Not a Significant Non-Complier (SNC). A determination has been made to remove the SNC designation for a facility. This can be as a result of the facility returning to full physical compliance with regulatory and/or statutory requirements or with a compliance schedule.

Note: This is an orphan evaluation record that is not linked to any specific violation or enforcement action. An SNN record will automatically be created by RCRIS during the universe calculation if there is an SNY record not superseded by a more recent SNN and all outstanding violations have returned to full physical compliance (CEV_ACT_DTE not equal to blank). Alternately,

the implementer can manually enter an SNN record to supersede an SNY record. In this case, the universe calculation program would not enter an SNN.

SNY A Significant Non-Complier (SNC). A determination has been made to classify a facility as a SNC using the following guidelines as set forth in the March 15, 1996 Hazardous Waste Civil Enforcement Response Policy (ERP). A SNC is a facility which has caused actual exposure or a substantial likelihood of exposure to hazardous waste or hazardous waste constituents; is a chronic or recalcitrant violator; or deviates substantially from the terms of a permit, order, agreement or from RCRA statutory or regulatory requirements. The actual or substantial likelihood of exposure should be evaluated using facility specific environmental and exposure information whenever possible. This may include evaluating potential exposure pathways and the mobility and toxicity of the hazardous waste being managed. However, it should be noted that environmental impact alone is sufficient to cause a facility to be a SNC, particularly when the environmental media affected require special protection (e.g., wetlands or sources of underground drinking water). Facilities should be evaluated on a multi-media basis; however, a facility may be found to be a chronic or recalcitrant violator based solely on prior RCRA violations and behavior.

Note: This is an orphan evaluation record that is not linked to any specific violation or enforcement action. This determination should be entered into RCRIS within 90 days after the implementer (EPA/State) determination is made since the SNC designation will be made publicly available from the National Oversight Database (NOS).

SPL Sampling Inspection. This is an evaluation type in which samples are collected for laboratory analysis. A sampling inspection will frequently be conducted in conjunction with the CES or CMS but occurs at a different time or by different personnel to stand on its own as a separate inspection. In those cases, a Handler Evaluation Form for each evaluation (Sampling and CES/CMS) should be completed to reflect that both were done. Sampling inspections may also be necessary for additional enforcement case development.

Multimedia Evaluation Types:**MMB RCRA CEI Performed with the Screening Checklist.**

MMC Comprehensive and Coordinated Inspection. This value includes the performance of a RCRA CEI in a coordinated effort with other programs at a handler's site.

MMD Detailed Multimedia Inspection. This value includes the performance of a RCRA CEI by a specially trained inspector at a handler's site.

MMS Multimedia Screening Checklist Only. A CEI was not performed; however, the screening checklist was performed alone or as part of another type of inspection.

Appendix D

Generator Indicator (GEN)

Generator Indicator (GEN) explanation of values:

1 Large Quantity Generators (LQG) are handlers which:

- Generate 1,000 kg or more of hazardous waste during any calendar month; or
- Generate more than 1 kg of acutely hazardous waste during any calendar month; or
- Generate more than 100 kg of any residue or contaminated soil, waste or other debris resulting from the cleanup of a spill, into or on any land or water, of acutely hazardous waste during any calendar month; or
- Generate 1 kg or less of acutely hazardous waste during any calendar month, and accumulate more than 1 kg of acutely hazardous waste at any time; or
- Generate 100 kg or less of any residue or contaminated soil, waste or other debris resulting from the cleanup of a spill, into or on any land or water, of acutely hazardous waste during any calendar month, and accumulated more than 100 kg of that material at any time.

2 Small Quantity Generators are handlers which:

- Generate more than 100 and less than 1000 kilograms of hazardous waste during any calendar month and accumulate less than 6000 kg of hazardous waste at any time; or
- Generate 100 kg or less of hazardous waste during any calendar month, and accumulate more than 1000 kg of hazardous waste at any time.

3 Conditionally Exempt Small Quantity Generators are handlers which:

- Generate 100 kilograms or less of hazardous waste per calendar month, and accumulate 1000 kg or less of hazardous waste at any time; or
- Generate one kilogram or less of acutely hazardous waste per calendar month, and accumulate at any time:
 - 1 kg or less of acutely hazardous waste; or
 - 100 kg or less of any residue or contaminated soil, waste or other debris resulting from the cleanup of a spill, into or on any land or water, of acutely hazardous waste; or
- Generate 100 kg or less of any residue or contaminated soil, waste or other debris resulting from the cleanup of a spill, into or on any land or water, of acutely hazardous waste during any calendar month, and accumulate at any time:
 - 1 kg or less of acutely hazardous waste; or
 - 100 kg or less of any residue or contaminated soil, waste or other debris resulting from the cleanup of a spill, into or on any land or water, of acutely hazardous waste.

N Not a generator, verified

Blank Unverified

The values listed above are core values. Non-core values are: 4-9. Other state regulated waste to be defined locally to correspond to individual state needs.

Appendix E

Definition of Significant Non-Complier

Definition of Significant Non-Complier (SNC) for HBOYSNC, HSNC, and HISNC data fields:

FY '87 and '88:

Date violation determined (CEV_DTEDET) is between 10/01/86 and 09/30/88,

AND

Facility is an LDF (HUSUBJCEI CONTAINS 'L') and violation is Class 1 (CEV_CLAS EQ 1) and violation type (CEV_AREA) is ground water (DGW), financial responsibility (DFR), or closure/post-closure (DCL) and violation is still out of full physical compliance as of the beginning of the fiscal year ((CEV_ACT_DTE GE BOFY) OR (CEV_ACT_DTE EQ BLANK)).

OR

Facility is an LDF or TSF (HUSUBJCEI CONTAINS 'L' OR 'S' OR 'T' OR 'B') and violation is a Class 1 (CEV_CLAS EQ 1) and violation type (CEV_AREA) is Compliance Schedule violation (CAS) and violation is still out of full physical compliance ((CEV_ACT_DTE GE BOFY) OR (CEV_ACT_DTE EQ BLANK)).

Then facility is a SNC and HBOYSNC/HSNC/HISNC is set to 'X'.

FY '89 and '90:

Date violation determined (CEV_DTEDET) is between 10/01/88 and 09/30/90,

AND

Facility is an LDF or TSF (HUSUBJCEI CONTAINS 'L' OR 'S' OR 'T' OR 'B') and violation is Class 1 (CEV_CLAS EQ 1), and violation is a High Priority Violation (CEV_PRTY EQ '9') and violation is still out of full physical compliance at the beginning of the fiscal year ((CEV_ACT_DTE GE BOFY) OR (CEV_ACT_DTE EQ BLANK)).

Then facility is a SNC and HBOYSNC/HSNC/HISNC is set to 'X'.

FY '91 - '96:

Date violation determined (CEV_DTEDET) is between 10/01/90 and 09/30/96,

AND

Facility had a Class 1 violation (CEV_CLAS EQ 1) and violation is a High Priority violation (CEV_PRTY EQ '9') and violation is still out of full physical compliance at the beginning of the fiscal year ((CEV_ACT_DTE GE BOFY).

OR

(CEV_ACT_DTE EQ BLANK)).

Then facility is a SNC and HBOYSNC/HSNC/HISNC is set to 'X'.

FY '97 quarters 1 & 2:

(Uses both SNY/SNN select logic and Class 1 Priority 9 in order to account for regions which have gone back and added the appropriate SNY records and those who have not for quarters 1 & 2). Evaluation date (CE_DATE) is between 10/01/96 and 03/31/97 and has a SNY evaluation record which has not been superseded by a SNN record ((CE_DATE of SNY GT CE_DATE OF SNN).

OR

(CE_TYPE EQ SNY with no CE_TYPE EQ SNN)) and facility has at least one violation out of full physical compliance at the beginning of the fiscal year ((CEV_ACT_DTE GE BOFY) OR (CEV_ACT_DTE EQ BLANK)) and was not in compliance with its compliance schedule at the end of the second quarter FY '97 (CEV_SCH_DTE GE 03/31/97).

OR

Date violation determined (CEV_DTEDET) is between 10/01/96 and 03/31/97 and facility had a Class 1 violation (CEV_CLAS EQ 1) and violation is a High Priority violation (CEV_PRTY EQ '9') and violation is still out of full physical compliance at the beginning of the fiscal year ((CEV_ACT_DTE GE BOFY) OR (CEV_ACT_DTE EQ BLANK)) and was not in compliance with

its compliance schedule at the end of the second quarter FY '97 (CEV_SCH_DTE GE 03/31/97).

Then facility is a SNC and HBOYSNC/HSNC/HISNC is set to 'X'.

FY '97 quarters 3 & 4 and beyond:

Evaluation date (CE_DATE) is between 04/01/97 and 09/30/97, equal to or greater than 04/01/97, and has a SNY evaluation record which has not been superseded by a SNN record ((CE_DATE of SNY GT CE_DATE OF SNN) OR (CE_TYPE EQ SNY with no CE_TYPE EQ SNN)) and facility has at least one violation out of full physical compliance at the beginning of the fiscal year ((CEV_ACT_DTE GE BOFY) OR (CEV_ACT_DTE EQ BLANK)) and not in compliance with its compliance schedule at the end of the FY '97 (CEV_SCH_DTE GE 09/30/97).

Then facility is a SNC and HBOYSNC/HSNC/HISNC is set to 'X'.

Appendix F

Type of Instrument (INST)

Type of Instrument (INST) Codes:

- A Consent Order.** An order issued by the Agency that is negotiated with a respondent. The terms of the order are discussed and agreed upon by both EPA and the respondent before the order is signed. A Consent Order has the same effect of a unilateral order, and therefore any violation of a consent order will result in an enforcement action.
- C Consent Decree**
- D Judicial Decree.** An order by the court to undertake some activity or pay a fine to the government for violating RCRA and/or its regulation. It is not the result of an administrative action. A judge may either approve a settlement proposed by the parties, or he/she can impose his/her own remedy.
- J Judicial Order**
- M Permit Modification**
- N Order Modification**
- O Operating Permit**
- P Post-Closure Permit**
- S State Analogous.** Actions implemented using a State non-RCRA/HSWA analogous authority.
- U Unilateral Order**
- V Voluntary CA**
- Z Other**

Appendix G

Process Unit Group Legal Status (LEGSTAT)

Process Unit Group Legal Status (LEGSTAT) values:

DL Delisted. Use DL to designate units that have been delisted, or units at which all hazardous waste ever handled by the unit have been delisted.

EM Emergency Permitted. Use EM for units regulated by the provisions for emergency permits under section 270.61. An EM unit should remain in that legal status throughout the life of the unit, including closure.

IS Interim Status. Use IS to designate units that gain interim status under the provisions of section 270.70. A unit that complies with those provisions is presumed to gain interim status upon receipt of the Part A.

If an IS unit later is found not to have qualified for interim status, it would be designated NN if it operated without authority, or NR if it did not operate.

If interim status is later terminated under section 270.73(a) or (b), the unit would be designated IT.

If the unit loses interim status under the provisions of section 270.73(c), it would be designated LI.

If a permit is issued to an IS unit, it would be designated PI or PC.

Although IS processes/units will initially be unverified, subsequent verification should be tracked by entry of a Part A Determination event record (XX002) or the appropriate modification event record. Do not remove the IS legal status, however, until a formal decision is made that the unit did not qualify, and there has been formal notification of the company.

IT Interim Status Terminated. Use IT to designate units that have had interim status terminated under section 270.73(a) or (b). For example:

- An interim status unit for which a permit was denied for any reason including failure to submit a Part B in a timely manner or failure to submit a complete permit application.

LI Loss of Interim Status. Use LI to designate units that have lost interim status for failure to comply with the requirements of section 270.73(c) through (g). Do not use LI when a permit is denied. When a final permit determination is made

to deny a RCRA permit to a unit with interim status, the unit should be designate IT.

LP Loss of Pre-Mod Authorization. Use LP for loss of pre-mod authorization in cases where a unit with pre-mod authorization (PM) failed to comply with the appropriate requirements of section 270.42(g) for newly regulated units. For example:

- Failure to submit a permit modification application within regulatory time frames.
- Failure to establish a groundwater monitoring system for a land disposal unit.

NN Non-Notifier/Illegal Unit. Use NN to designate units that have operated illegally. For example:

- Units discovered to be operating without interim status, pre-mod authorization, or a permit.
- Units that applied for interim status or pre-mod authorization and failed to qualify, but operated.

NN should be used in these cases whether the unit is shut down or allowed to continue to operate under an order or interim status compliance letter.

A unit with a legal status of NN should be assigned an operating status of OP if:

- the unit is allowed to continue to operate, or
- the unit temporarily ceases to operate while seeking an operating permit but there is no intent to close the unit.

A unit with a legal status of NN should be assigned an operating status of IN if the unit will close.

NR Never Regulated as a TSD. Use NR to designate the following:

- Protective filers, or processes which were filed in error.
- Proposed new units that are withdrawn prior to permit issuance.
- Where a Part A was submitted to obtain interim status or pre-mod authorization, the unit was found to be ineligible, but the unit never operated as a TSD (e.g., less-than-90-day-storage units, exempt recycling units, units which never managed hazardous waste, and units that never existed).

PC Post-Closure Permitted. Use PC to designate a unit for which a post-closure permit has been issued.

When a permit is issued during closure of the unit, the PC legal status should be used or units closing with waste in place, and PI used for units that will clean close.

In the event that a PI unit attempts but is unable to achieve clean closure, a new unit record should be created with a legal status of PC when such determination is made.

PI Permitted. Use PI when an operating permit has been issued to a unit. The legal status of the unit should remain PI until:

- the permit expires and is not renewed or the permit is terminated (create a new record and use PT); or
- the permit is modified to address only post-closure care or a post-closure permit is issued to a unit that is closing or has closed with waste in place (create a new record and use PC).

PI should not be used when a permit is denied. The legal status of a unit prior to permit denial will determine its legal status following. For example:

- An IS unit will become IT, since permit denial terminates interim status.
- An NN unit will remain NN.
- A PR unit will be designated NR since it never operated and was never subject to RCRA requirements.
- An LI, LP, or IT unit retains that status following permit denial.

PI should not be used when a permit is issued during or following closure of a unit that is closing with waste in place (use PC).

In addition, PI should not include units for which the only permit activities are RD&D permits (RD), permits-by-rule (RU), emergency permits (EM), or other state permits (SR).

PM Pre-Mod Authorization. Use PM to designate newly-regulated units at permitted facilities that are authorized to operate under section 270.42(g) while a permit modification application is pending. For example:

- A previously unregulated unit at a permitted facility that becomes regulated as a hazardous waste unit due to a new waste listing. If a PM unit later is found not to have qualified for pre-mod authorization, it should be designated NN if it operated without authority, or NR if it did not operate.

PR Proposed. Use PR to designate a "new" unit for which the owner/operator is pursuing an operating permit where:

- The unit is not constructed, or
- The unit has never been eligible for interim status or pre-mod authorization, and has never operated illegally.

Use PR to designate units intended to replace similar units that were previously operated and clean closed, but require an operating permit before legal operation can be resumed.

Use PR to designate new units that are being added to a facility as a change in interim status under the provisions of section 270.72(a).

PT Permit Terminated/Permit Expired, not Continued. Use PT to designate units for which an operating (PI) or post-closure (PC) permit has been terminated under the authority of section 270.43, and units with permits that expire and are not continued in accordance with section 270.51.

Permitted units for which the permit is renewed should retain the PI or PC legal status.

RD Research, Development, and Demonstration Permitted. Use RD for units regulated by the provisions for RD&D permits under section 270.65. An RD unit should remain in that legal status throughout the life of the unit (i.e., from application through closure).

RQ Requested but Not Approved. Use RQ as a transitional status code for tracking the following requests:

- increases in capacity of existing interim status units (section 270.72(a)(2)) or changes in the process (section 270.72(a)(3))
- additional capacity at permitted units
- requests for temporary authorization.

RQ should not be used to designate a previously unregulated unit that becomes a newly regulated hazardous waste unit due to a new waste listing (use IS or PM).

RQ should not be used to designate new units added as a change in interim status under section 270.72(a) (use PR).

For increases in design capacity or changes in an existing process, the revised process information should be entered into the appropriate fields (or into the comment field, if existing process information is not affected). If or when the requested change is approved and the modification takes effect, a subsequent process segment record should be created with the new information and the applicable legal status code (which is likely to be the same as the status before the change was requested).

RU Permit-by-Rule. Use RU for units at which the only activities subject to RCRA permit requirements are processes regulated under section 270.60. An RU unit should remain in that legal status throughout the life of the unit, including closure. Examples:

- Ocean dumping (process code D82).
- UIC wells (D79).
- Publicly-owned treatment works that receive RCRA-regulated hazardous waste.

SR State Regulated. Use SR to designate units that are regulated only under broader or more stringent State standards, and are not subject to RCRA permit requirements.

TA Temporary Authorization. Use TA to designate a new unit that has received temporary authorization under the authority of section 270.42(e) for installation and operation at a permitted facility.

Do not use TA to designate a permitted unit (PI) that has received a temporary authorization to modify its operations (that unit remains PI).

Upon expiration of the temporary authorization, or if a permit is denied to a TA unit, use PT.

If a permit is denied to a TA unit, use PT.

Appendix H

Process Operating Status (OPSTAT)

Process Operating Status (OPSTAT) values:

AB Abandoned. Use AB for units at which the owner or operator is unwilling/unable to accept legal responsibility to close the unit. Use AB regardless of whether the unit is being addressed under a non-RCRA authority except, Do not use AB if an abandoned unit has been referred to CERCLA for cleanup (use SF).

BC Before Construction. Use BC for proposed "new" units for which Parts A and B of the permit application have been received.

Note: in most cases BC represents the "grassy field" scenario where no ground has been broken. Units should maintain this status until an operating permit has been issued and construction has physically begun (at which time operating status code UC should be used), or until the permit is denied (at which time the unit would be designated NR/BC).

CC Clean Closed. Use CC to designate a unit that has completed clean closure. Closure is completed when all closure activities have occurred, and closure has been verified. This usually includes closure certification (sections 264.115 and 265.115), inspection of the unit to verify that the closure was conducted in accordance with the approved closure plan, and release of the owner or operator from financial assurance (sections 264.143(i) and 265.143(h)).

Note: IN rather than CC should be used from the period starting with the receipt of the final volume of hazardous waste and ending with closure completion.

If a CC unit later fails an equivalency demonstration under section 270.1(c)(5), a new record should be created with an operating status of IN if the owner or operator will conduct further closure activities, or CP if the unit will enter post-closure care.

CN Constructed, Not Yet Managing Hazardous Waste. Use CN for existing units entering the "RCRA process pipeline," but are not yet managing hazardous waste. For example:

- Newly-permitted units that have completed construction, but have not yet begun operation with hazardous waste;
- Units that have managed only non-RCRA waste, but are pursuing RCRA permits to manage hazardous waste; and

- Units that are clean closed, and then upgraded to resume management of RCRA-regulated hazardous waste.

CN should not be used to designate units that are handling newly listed wastes (use OP).

CO Completed Post-Closure Care. Use CO to indicate that the post-closure care period at the unit has been completed.

CP Closed With Waste in Place. Use CP to designate a unit that has completed closure with waste-in-place.

Closure is completed when all closure activities have occurred, and closure has been verified. This usually includes closure certification (sections 264.115 and 265.115), inspection of the unit to verify that the closure was conducted in accordance with the approved closure plan, and release of the owner or operator from financial assurance (sections 264.143(i) and 265.143(h)).

CR Conducting Activities not Requiring a Permit. Use CR to designate former TSD units that conduct only activities not subject to permitting. CR should be limited, however, to units that had no legal requirement to close. For example, use CR to designate units that have been delisted, or units that handled only waste that has been delisted.

CR should not be used to designate units that converted to less than 90-day storage or non-hazardous waste activities but clean closed--use "CC" for those units.

CR also should not be used to designate protective filers (use PF).

CV Converted but Not RCRA Closed. Use CV to designate units that converted to hazardous waste activities that do not require a permit (e.g., less than 90-day storage, totally enclosed treatment) but were required to clean close and did not.

CV should not be used to designate units that clean closed and then converted to non-permit activities--use CC for those units. CV should not be used to designate units that converted to non-permit activities but were not required to clean close (e.g., delisted units) (use CR).

DC Delay of Closure. Use DC to designate landfill, land treatment, or surface impoundment units that have received the final volume of hazardous waste but, rather than begin closure, will continue to operate to receive non-hazardous

waste under the authority of the "delay of closure" provisions of sections 264.113(d) and (e) or 265.113(d) and (e).

IN Inactive/Closing, but Not Yet RCRA Closed. Use IN to identify units that are subject to RCRA closure requirements, and have received the final volume of hazardous waste, but have not completed closure activities as required to be designated CC or CP. Units with a legal status of NN should be assigned an operating status of IN if the unit will close.

IN should not be used to designate units that have received the final volume of hazardous waste but have not begun closure and are continuing to operate to receive non-hazardous waste under the delay of closure provisions of section 264.113(d) and (e) and 265.113(d) and (e) (use DC).

OP Operating, Actively Managing RCRA-Regulated Waste. Use OP to designate active units that are conducting hazardous waste management activities subject to permitting. OP should be used regardless of the current legal status of the unit. For example, OP should be used to designate units that are:

- operating under interim status or pre-mod authorization;
- operating under permits;
- allowed to continue operation under enforcement orders, or interim status compliance letters;
- under temporary suspension of hazardous waste activities pending decision to allow operation (e.g., awaiting permit issuance) where the intent is to operate, rather than close, the unit. A unit with a legal status of "NN" should be assigned an operating status of "OP" if:
 - the unit is allowed to continue to operate, or
 - the unit temporarily ceases to operate while seeking an operating permit but there is no intent to close the unit.

PF Protective Filer. Use PF to designate units that were submitted on a Part A but:

- are not RCRA regulated, or
- do not exist physically.

SF Referred to CERCLA. Use SF to designate units (AB or other) that have been referred to CERCLA for cleanup.

UC Under Construction. Use UC to designate a new unit that has received an operating permit and begun construction, but has not yet started managing

hazardous waste, or a unit that is "under construction" as defined in the section 260.10 definition of "existing hazardous waste management facility."

Appendix I

Permit Event Activity Track/ Event Code/Status Code

The following table displays codes for the Permit Event Activity Track/Event Code (PECODE) and the Event Status Codes (PESTAT, IEVSTAT).

Activity Tracks CL, EP, MO, MP, OP, PC, and RD are related to Permitting, Closure, and Post-Closure events. Event Status codes for which refer to these events are valid codes for PESTAT.

Activity Tracks CA, CE, CM, FM, and PM are related to Corrective Action, CM&E Enforcement, CM&E Inspection, FMP, and Program Management events respectively. Event Status codes which refer to these events are valid codes for IEVSTAT.

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
Activity Track: Closure (CL)			
CL120		Waiver Requested	
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
CL130		Waiver Public Notice - Intent To Approve	
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
CL131		Waiver Public Notice - Intent To Deny	
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
CL140		Waiver Request Approved	
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
CL141		Waiver Request Denied	
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
CL142		Waiver Request Withdrawn	
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
CL310		Plan Received - Closure	Y
CL315		Intends to Seek Permit	N
CL320		Notice of Deficiency - Closure Plan	
CL330		Revisions Received - Closure	
CL340		Public Notice - Closure	
CL350		Public Hearing - Closure	
CL360		Plan Approved - Closure	
	ME	Final Closure	
	MO	Partial Closure	
CL370		Receive Closure Certification	
	NO	Not According to Plan	
	YE	According to Plan	
CL380		Closure Verification	Y
	CA	Clean Closure Acceptable	
	CU	Clean Closure Unacceptable	
	DA	In-place Closure Acceptable	
	DU	In-place Closure Unacceptable	
CL390		Notice Of Deed Registry Received	
CL395		Equivalency Determination	
	EQ	Clean closure meets 40 CFR 264 standards	
	NE	Clean closure does not meet 40 CFR 264 standards	
CL401		Closure Notice Received	N
CL402		Closure Plan Requested	N
CL404		Review of Closure Plan Completed	N
CL405		Cost Estimated/Funding Adequate	N
CL408		First Decision Made	N
CL411		Closure Process Begun	N
CL413		Closure Period Completed	N
CL414		Facility Released From Closure Requirement	N
CL435		Closure Comments to EPA	N
Activity Track: Emergency Permit (EP)			
EP001		Part A Received	N
	IS	Initial Submittal	
	CS	Request for Change under Interim Status	
	PB	Submitted with a Part B or Mod Request	
EP002		Part A Determination	N
	AK	Acknowledgement of Part A Receipt	
	VE	Verified by Inspection to Exist	
	AP	Approval of Interim Status Change	
	DR	Denied Request	
	IC	Part A Late, Interim Status Compliance Letter Issued	
EP003		Process Determination	N

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
	AD	Agency (State or EPA) Determination	
	FD	Facility Certified Document	
EP010		Emergency Permit Request Call-In	N
EP020		Emergency Permit Request Received	N
	CR	Confidentiality Requested	
	CS	Confidentiality Substantiated	
	CU	Confidentiality Unsubstantiated	
EP030		LTF Demo Plan Approved	N
EP040		LTF Demo Started	N
EP050		LTF Demo Completed	N
EP060		LTF Demo Results Received	N
EP070		Trial Burn Plan Approved	N
EP080		Trial Burn Conducted	N
EP090		Trial Burn Results Received	N
EP100		Notice Of Deficiency	N
EP110		Revisions Received	N
	CO	Complete	
	IN	Incomplete	
EP120		Waiver Requested	
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
EP130		Waiver Public Notice - Intent To Approve	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
EP131		Waiver Public Notice - Intent To Deny	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
EP140		Waiver Request Approved	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
EP141		Waiver Request Denied	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
EP142		Waiver Request Withdrawn	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	N
EP150		Determined To Be Complete and Technically Adequate	N
EP160		Public Notice	
	DP	Draft Permit Issued	
	ID	Intent To Deny	
EP170		Public Hearing	N
	IP	Informal Public	
	PN	Panel	
EP180		Received Withdrawal Request	N
	DL	Delisted Waste	
	FC	Applicant Has Closed Or Intends To Close All Waste Handling Facilities	
	FE	Applicant Was A Protective Filer	
	LN	Applicant Has Gone Or Will Go To Less Than Ninety Day Storage	
	NW	Applicant Handles Or Will Handle Only Non-Regulated Waste	
	OT	Other Reason For Withdrawal	
	SQ	Applicant Has Become Or Will Become A Small Quantity Generator With Onsite Storage	
EP190		Withdrawal Request Determination	N
	AR	Approved Requested	
	DR	Denied Request	
EP200		Emergency Permit Final Determination	
	PD	Permit Denied	
	PG	RCRA Permit Issued With HSWA Requirements, Corrective Action Schedule Not Necessary	
	PI	RCRA Permit Issued, HSWA Requirements Do Not Apply To This Facility	
	PJ	RCRA Permit Issued, With HSWA Requirements, Including a Schedule For Corrective Action	
	PP	Permit Issued By State, HSWA Requirements Apply But EPA Permit Covering HSWA has Not Been Issued	
EP210		Determination Appealed	N
EP220		Appeal Settled	N
	DI	Decision Issued With No Remand	
	RC	Remand Proceedings Completed	
	RD	Review Of Decision	
EP230		Modification Requested	N
	AC	Additional Capacity	
	AP	Additional Process	
	CA	Corrective Action Modification	

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
	GW	Groundwater Monitoring Modification	
	OH	Modification Other Than Groundwater	
EP231		Class Determination	N
	AI	Agency Initiated Mod	
	10	Class 1 Mod, No Prior Approval Required	
	11	Class 1 Mod, Prior Approval Required	
	20	Class 2 Mod	
	30	Class 3 Mod	
	MJ	Major (old classification still in use by some States)	
	MN	Minor (old classification still in use by some States)	
EP240		Modification Determination	N
	AC	Additional Capacity	
	AP	Additional Process	
	CA	Corrective Action Modification	
	GW	Groundwater Monitoring Modification	
	MD	Modification Denied	
	OH	Modification Other Than Groundwater Monitoring Or Corrective Action	
	RW	Request Withdrawn	
EP242		Significance Determination	N
	SI	Significant	
	NS	Not Significant	
EP250		Permit Reviewed	N
EP260		Permit Termination	N
EP270		Permit Expires	N
EP370		Receive Closure Certification	N
	NO	Not According to Plan	
	YE	According to Plan	
EP380		Closure Verification	
	AC	Acceptable Closure	
	UC	Unacceptable Closure	
EP381		Date Inspected To Confirm Post-Closure	N
EP390		Notice Of Deed Registry Received	N
EP428		Presiding Officer's Decision issued	N
EP429		Presiding Officer's Decision Appealed	N
Activity Track: Operating Permit Modification (MO)			
MO001		Part A Received	N
	IS	Initial Submittal	
	CS	Request for Change under Interim Status	
	PB	Submitted with a Part B or Mod Request	
MO002		Part A Determination	N
	AK	Acknowledgement of Part A Receipt	
	VE	Verified by Inspection to Exist	
	AP	Approval of Interim Status Change	
	DR	Denied Request	
	IC	Part A Late, Interim Status Compliance Letter Issued	
MO003		Process Determination	N
	AD	Agency (State or EPA) Determination	
	FD	Facility Certified Document	
MO010		Part B Call-In	N

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
MO011		Pre-Compliance Certification Submitted Y	Y
MO012		Pre-Compliance Certification Review Comp	Y
MO013		Notification of Compliance Testing	Y
MO014		Automatic Compliance Extension Requested	Y
MO020		Part B Received	N
	CR	Confidentiality Requested	
	CS	Confidentiality Substantiated	
	CU	Confidentiality Unsubstantiated	
MO030		LTF Demo Plan Approved N	N
MO040		LTF Demo Started	N
MO050		LTF Demo Completed	N
MO060		LTF Demo Results Received	N
MO070		Trial Burn Plan Approved	N
MO080		Trial Burn Conducted	N
MO090		Trial Burn Results Received	N
MO100		Notice Of Deficiency	N
MO110		Revisions Received	N
	CO	Complete	
	IN	Incomplete	
MO120		Waiver Requested	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
MO130		Waiver Public Notice - Intent To Approve	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
MO131		Waiver Public Notice - Intent To Deny	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
MO140		Waiver Request Approved	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
MO141		Waiver Request Denied	N
	01	Double Liner Waiver	

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
MO142		Waiver Request Withdrawn	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
MO150		Determined To Be Complete and Technically Adequate	N
MO160		Public Notice	N
	DP	Draft Permit Issued	
	ID	Intent To Deny	
MO170		Public Hearing	N
	IP	Informal Public	
	PN	Panel	
MO180		Received Withdrawal Request	
	DL	Delisted Waste	
	FC	Applicant Has Closed Or Intends To Close All Waste Handling Facilities	
	FE	Applicant Was A Protective Filer	
	LN	Applicant Has Gone Or Will Go To Less Than Ninety Day Storage	
	NW	Applicant Handles Or Will Handle Only Non-Regulated Waste	
	OT	Other Reason For Withdrawal	
	SQ	Applicant Has Become Or Will Become A Small Quantity Generator With Onsite Storage	
MO190		Withdrawal Request Determination	N
	AR	Approved Requested	
	DR	Denied Request	
MO200		Final Determination	
	PD	Permit Denied	
	PG	RCRA Permit Issued With HSWA Requirements, Corrective Action Schedule Not Necessary	
	PI	RCRA Permit Issued, HSWA Requirements Do Not Apply To This Facility	
	PJ	RCRA Permit Issued, With HSWA Requirements, Including a Schedule For Corrective Action	
	PP	Permit Issued By State, HSWA Requirements Apply But EPA Permit Covering HSWA has Not Been Issued	
MO205		Final Permit Effective	N
MO210		Determination Appealed	N
MO220		Appeal Settled	N
	DI	Decision Issued With No Remand	
	RC	Remand Proceedings Completed	
	RD	Review Of Decision	
MO230		Modification Requested	
	AC	Additional Capacity	

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
	AP	Additional Process	
	CA	Corrective Action Modification	
	GW	Groundwater Monitoring Modification	
	OH	Modification Other Than Groundwater	
MO231		Class Determination	N
	AI	Agency Initiated Mod	
	10	Class 1 Mod, No Prior Approval Required	
	11	Class 1 Mod, Prior Approval Required	
	20	Class 2 Mod	
	30	Class 3 Mod	
	MJ	Major (old classification still in use by some States)	
	MN	Minor (old classification still in use by some States)	
MO250		Permit Reviewed	N
MO260		Permit Termination	N
MO270		Permit Expires	N
MO370		Receive Closure Certification	N
	NO	Not According to Plan	
	YE	According to Plan	
MO380		Closure Verification	N
	AC	Acceptable Closure	
	UC	Unacceptable Closure	
MO381		Date Inspected To Confirm Post-Closure	N
MO390		Notice Of Deed Registry Received	N
MO403		Application Reviewed for Completeness	N
MO407		Project Decision Schedule Issued	N
MO408		Trial Burn Plan Submitted	N
MO409		Trial Burn Plan Reviewed	N
MO412		Trial Burn Results Review Completed	N
MO414		Public Notice Issued for Hearing	N
MO421		Permit Revoked and Reissued	N
MO423		Permit Transferred	N
MO424		Evidentiary Hearing Requested	N
MO425		Evidentiary Hearing Granted/Denied	N
MO426		Public Notice Issued/Evidentiary	N
MO427		Evidentiary Hearing Held	N
MO428		Presiding Officer's Decision issued	N
MO429		Presiding Officer's Decision Appealed	N
MO431		Judicial Review Requested	
MO434		Permit Application Referred to Auth State	
MO435		Permit Application Undergoing Full Permit	
MO439		Facility Management Plan Screen	
MO440		Facility Management Plan Reviewed	
MO441		HSWA Information Requested	
MO442		Regionally Defined Field	
MO443		Exposure Information Received	
MO444		Exposure Information Reviewed	
MO445		Exposure Information Referred for Health	
MO446		Previously Non-Regulated RCRA Solid Waste Mgmt Units	
MO447		Solid Waste Mgmt Units Verified	

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
MO448		Releases Identified by Facility	
MO449		Releases Verified by the Agency	
MO450		Certification Compliance with Groundwater	
MO451		Regionally Defined Field	
MO452		Regionally Defined Field	
MO453		Regionally Defined Field	
MO454		RCRA Facility Assessment	
MO455		Remedial Investigation Imposed	
MO456		Remedial Invert Plan Received/Developed by EPA/State	
MO457		Remedial Investigation Plan Approved via Permit	
MO458		Corrective Measures Decision Made	
MO459		Corrective Measures Plan Approved	
MO460		Corrective Measures Plan Completed	
MO461		Financial Assurance Mech for Correct Act	
MO462		FAC Notified of Determination Compliance	
MO463		Groundwater Monitoring Program Developed	
MO464		Regionally Defined	
MO465		Regionally Defined	
MO466		Interim Measures Required	
MO467		Interim Measures Completed	
MO476		Reserved for Future Use	
MO478		Reserved for Future Use	
MO479		Reserved for Future Use	
MO480		Regionally Defined	
Activity Track: Post-Closure Modification (MP)			
MP001		Part A Received	N
	IS	Initial Submittal	
	CS	Request for Change under Interim Status	
	PB	Submitted with a Part B or Mod Request	
MP002		Part A Determination	N
	AK	Acknowledgement of Part A Receipt	
	VE	Verified by Inspection to Exist	
	AP	Approval of Interim Status Change	
	DR	Denied Request	
	IC	Part A Late, Interim Status Compliance Letter Issued	
MP003		Process Determination	N
	AD	Agency (State or EPA) Determination	
	FD	Facility Certified Document	
MP010		Part B Call-In	N
MP020		Part B Received	N
	CR	Confidentiality Requested	
	CS	Confidentiality Substantiated	
	CU	Confidentiality Unsubstantiated	
MP100		Notice Of Deficiency	N
MP110		Revisions Received	N
	CO	Complete	
	IN	Incomplete	
MP120		Waiver Requested	N
	01	Double Liner Waiver	

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
MP130		Waiver Public Notice - Intent To Approve	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
MP131		Waiver Public Notice - Intent To Deny	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
MP140		Waiver Request Approved	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
MP141		Waiver Request Denied	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
MP142		Waiver Request Withdrawn	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
MP150		Determined To Be Complete and Technically Adequate	N
MP160		Public Notice	N
	DP	DP Draft Permit Issued	
	ID	Intent To Deny	
MP170		Public Hearing	N
	IP	Informal Public	
	PN	Panel	
MP180		Received Withdrawal Request	
	DL	Delisted Waste	

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
	FC	Applicant Has Closed Or Intends To Close All Waste Handling Facilities	
	FE	Applicant Was A Protective Filer	
	LN	Applicant Has Gone Or Will Go To Less Than Ninety Day Storage	
	NW	Applicant Handles Or Will Handle Only Non-Regulated Waste	
	OT	Other Reason For Withdrawal	
	SQ	Applicant Has Become Or Will Become A Small Quantity Generator With Onsite Storage	
MP190		Withdrawal Request Determination	N
	AR	Approved Requested	
	DR	Denied Request	
MP200		Final Determination	
	PD	Permit Denied	
	PG	RCRA Permit Issued With HSWA Requirements, Corrective Action Schedule Not Necessary	
	PI	RCRA Permit Issued, HSWA Requirements Do Not Apply To This Facility	
	PJ	RCRA Permit Issued, With HSWA Requirements, Including a Schedule For Corrective Action	
	PP	Permit Issued By State, HSWA Requirements Apply But EPA Permit Covering HSWA has Not Been Issued	
MP205		Final Permit Effective	N
MP210		Determination Appealed	N
MP220		Appeal Settled	N
	DI	Decision Issued With No Remand	
	RC	Remand Proceedings Completed	
	RD	Review Of Decision	
MP230		Modification Requested	
	AC	Additional Capacity	
	AP	Additional Process	
	CA	Corrective Action Modification	
	GW	Groundwater Monitoring Modification	
	OH	Modification Other Than Groundwater	
MP231		Class Determination	N
	AI	Agency Initiated Mod	
	10	Class 1 Mod, No Prior Approval Required	
	11	Class 1 Mod, Prior Approval Required	
	20	Class 2 Mod	
	30	Class 3 Mod	
	MJ	Major (old classification still in use by some States)	
	MN	Minor (old classification still in use by some States)	
MP250		Permit Reviewed	N
MP260		Permit Termination	N
MP270		Permit Expires	N
MP370		Receive Closure Certification	N
	NO	Not According to Plan	
	YE	According to Plan	
MP310		Plan Received - Closure/Post-Closure	
	CL	Closure	
	PC	Post/Closure	

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
MP320		Notice of Deficiency - Closure/ Post-Closure Plan	N
MP330		Revisions Received - Closure/Post-Closure	N
	CL	Closure	
	PC	Post-Closure	
MP340		Public Notice - Closure/Post-Closure	N
	CL	Closure	
	PC	Post-Closure	
MP350		Public Hearing - Closure/Post-Closure	N
	CL	Closure	
	PC	Post-Closure	
MP360		Plan Approved – Closure/Post-Closure	
	ME	Final Closure	
	MF	Final Post-Closure	
	MO	Partial Closure	
	MP	Partial Post-Closure	
MP370		Receive Closure Certification	
	NO	Not According to Plan	
	PC	Post-Closure	
	YE	According to Plan	
MP380		Closure Verification	N
	AC	Acceptable Closure	
	UC	Unacceptable Closure	
MP390		Notice Of Deed Registry Received	
MP401		Closure Notice Received N	N
MP402		Closure Plan Requested	N
MP404		Review of Closure/Post-Closure Plan Comp	N
MP405		Cost Estimated/Funding Adequate	N
MP408		First Decision Made	N
MP411		Closure Process Begun	N
MP413		Post-Closure Period Begun	N
MP415		Post-Closure Record of Waste Received	N
MP416		Post-Closure Period Completed	N
MP417		Facility Released from Closure Requirement	N
MP418		Facility Released From Post-Closure Requirements	N
Activity Track: Operating (OP)			
OP001		Part A Received	N
	IS	Initial Submittal	
	CS	Request for Change under Interim Status	
	PB	Submitted with a Part B or Mod Request	
	XX	Temporary code used in RCRIS 6.0.0 optional conversion of process data from the Handler Module; should be converted to one of the status codes listed above	
OP002		Part A Determination	N
	AK	Acknowledgement of Part A Receipt	
	VE	Verified by Inspection to Exist	
	AP	Approval of Interim Status Change	
	DR	Denied Request	
	IC	Part A Late, Interim Status Compliance Letter Issued	
OP003		Process Determination	N

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
	AD	Agency (State or EPA) Determination	
	FD	Facility Certified Document	
OP010		Part B Call-In	N
OP011		Pre-Compliance Certification Submitted Y	Y
OP012		Pre-Compliance Certification Review Completed	Y
OP013		Notification of Compliance Testing	Y
OP014		Case-by-Case Compliance Extension Requested	Y
OP015		Loss of Interim Status (LOIS)	
	01	Failed to submit Part B and to certify compliance with groundwater monitoring and financial responsibility requirements.	
	02	Failed to Submit Part B and to certify compliance with financial responsibility requirements.	
	03	Failed to submit Part B and to certify compliance with Groundwater monitoring requirements.	
	04	Failed to certify compliance with groundwater monitoring and financial responsibilities.	
	05	Failed to submit Part B.	
	06	Failed to certify compliance with groundwater monitoring requirements.	
	07	Failed to certify compliance with financial responsibility requirements	
	08	Interim status lost, reason not yet determined, or other than above	
OP016		Case-by-Case Compliance Extension Granted	Y
	AR	Approved Request	
	DR	Denied Request	
OP020		Part B Received	N
	CR	Confidentiality Requested	
	CS	Confidentiality Substantiated	
	CU	Confidentiality Unsubstantiated	
OP021		Notification of Automatic Extension	Y
OP022		Compliance Certification Submitted	Y
OP023		Compliance Certification Review Completed	Y
OP024		Compliance Extension Expires	Y
OP030		LTF Demo Plan Approved	N
OP040		LTF Demo Started	N
OP050		LTF Demo Completed	N
OP060		LTF Demo Results Received	N
OP070		Trial Burn Plan Approved	N
OP080		Trial Burn Conducted	N
OP090		Trial Burn Results Received	N
OP100		Notice Of Deficiency	N
OP110		Revisions Received	N
	CO	Complete	
	IN	Incomplete	
OP120		Waiver Requested	
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
OP130		Waiver Public Notice - Intent To Approve	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
OP131		Waiver Public Notice - Intent To Deny	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
OP140		Waiver Request Approved	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
OP141		Waiver Request Denied	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
OP142		Waiver Request Withdrawn	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
OP150		Determined To Be Complete and Technically Adequate	N
OP160		Public Notice	Y
	DP	DP Draft Permit Issued	
	ID	Intent To Deny	
OP170		Public Hearing	N
	IP	Informal Public	
	PN	Panel	
OP180		Received Withdrawal Request	
	DL	Delisted Waste	
	FC	Applicant Has Closed Or Intends To Close All Waste Handling Facilities	
	FE	Applicant Was A Protective Filer	
	LN	Applicant Has Gone Or Will Go To Less Than Ninety Day Storage	
	NW	Applicant Handles Or Will Handle Only Non-Regulated Waste	
	OT	Other Reason For Withdrawal	

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
	SQ	Applicant Has Become Or Will Become A Small Quantity Generator With Onsite Storage	
OP190		Withdrawal Request Determination	N
	AR	Approved Requested	
	DR	Denied Request	
OP200		Final Determination	
	PD	Permit Denied	
	PG	RCRA Permit Issued With HSWA Requirements, Corrective Action Schedule Not Necessary	
	PI	RCRA Permit Issued, HSWA Requirements Do Not Apply To This Facility	
	PJ	RCRA Permit Issued, With HSWA Requirements, Including a Schedule For Corrective Action	
	PP	Permit Issued By State, HSWA Requirements Apply But EPA Permit Covering HSWA has Not Been Issued	
OP205		Final Permit Effective	N
OP210		Determination Appealed	N
OP220		Appeal Settled	N
	DI	Decision Issued With No Remand	
	RC	Remand Proceedings Completed	
	RD	Review Of Decision	
OP230		Modification Requested	
	AC	Additional Capacity	
	AP	Additional Process	
	CA	Corrective Action Modification	
	GW	Groundwater Monitoring Modification	
	OH	Modification Other Than Groundwater	
OP231		Class Determination	N
	AI	Agency Initiated Mod	
	10	Class 1 Mod, No Prior Approval Required	
	11	Class 1 Mod, Prior Approval Required	
	20	Class 2 Mod	
	30	Class 3 Mod	
	MJ	Major (old classification still in use by some States)	
	MN	Minor (old classification still in use by some States)	
OP240		Modification Determination	
	AC	Additional Capacity	
	AP	Additional Process	
	BF	BIF Modification	
	CA	Corrective Action Modification	
	GW	Groundwater Monitoring Modification	
	OH	Modification Other Than Groundwater Monitoring Or Corrective Action	
OP242		Significance Determination	
	SI	Significant	
	NS	Not Significant	
OP245		Modification Denied	N
	AC	Additional Capacity	
	AP	Additional Process	
	BF	BIF Modification	

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
	CA	Corrective Action	
	GW	Groundwater Monitoring Modification	
	OH	Other	
OP250		Permit Reviewed	N
OP260		Permit Termination	N
OP270		Permit Expires	Y
OP315		Intends to Close Permitted Unit	N
OP370		Receive Closure Certification	N
	NO	Not According to Plan	
	YE	According to Plan	
OP380		Closure Verification	N
	AC	Acceptable Closure	
	UC	Unacceptable Closure	
OP381		Date Inspected To Confirm Post-Closure	N
OP390		Notice Of Deed Registry Received	N
OP403		Application Reviewed for Completeness	N
OP407		Project Decision Schedule Issued	N
OP408		Trial Burn Plan Submitted	N
OP409		Trial Burn Plan Reviewed	N
OP412		Trial Burn Results Review Completed	N
OP414		Public Notice Issued for Hearing	N
OP421		Permit Revoked and Reissued	N
OP423		Permit Transferred	N
OP424		Evidentiary Hearing Requested	N
OP425		Evidentiary Hearing Granted/Denied	N
OP426		Public Notice Issued/Evidentiary	N
OP427		Evidentiary Hearing Held	N
OP428		Presiding Officer's Decision issued	N
OP429		Presiding Officer's Decision Appealed	N
OP431		Judicial Review Requested	N
OP434		Permit Application Referred to Auth State	N
OP435		Permit Application Undergoing Full Permit	N
OP439		Facility Management Plan Screen	N
OP440		Facility Management Plan Reviewed	N
OP441		HSWA Information Requested	N
OP442		Regionally Defined Field	N
OP443		Exposure Information Received	N
OP444		Exposure Information Reviewed	N
OP445		Exposure Information Referred for Health	N
OP446		Previously Non-Regulated RCRA Solid Waste Mgmt Units	N
OP447		Solid Waste Mgmt Units Verified	N
OP448		Releases Identified by Facility	N
OP449		Releases Verified by the Agency	N
OP450		Certification Compliance with Groundwater	N
OP451		Regionally Defined Field	N
OP452		Regionally Defined Field	N
OP453		Regionally Defined Field	N
OP454		RCRA Facility Assessment	N
OP455		Remedial Investigation Imposed	N

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
OP456		Remedial Invert Plan Received/Developed by EPA/State	N
OP457		Remedial Investigation Plan Approved via Permit	N
OP458		Corrective Measures Decision Made	N
OP459		Corrective Measures Plan Approved	N
OP460		Corrective Measures Plan Completed	N
OP461		Financial Assurance Mech for Correct Act	N
OP462		FAC Notified of Determination Compliance	N
OP463		Groundwater Monitoring Program Developed	N
OP464		Regionally Defined	N
OP465		Regionally Defined	N
OP466		Interim Measures Required	N
OP467		Interim Measures Completed	N
OP476		Reserved for Future Use	N
OP478		Reserved for Future Use	N
OP479		Reserved for Future Use	N
OP480		Regionally Defined	N
Activity Track: Post-Closure (PC)			
PC001		Part A Received	N
	IS	Initial Submittal	
	CS	Request for Change under Interim Status	
	PB	Submitted with a Part B or Mod Request	
PC002		Part A Determination	N
	AK	Acknowledgement of Part A Receipt	
	VE	Verified by Inspection to Exist	
	AP	Approval of Interim Status Change	
	DR	Denied Request	
	IC	Part A Late, Interim Status Compliance Letter Issued	
PC003		Process Determination	N
	AD	Agency (State or EPA) Determination	
	FD	Facility Certified Document	
PC010		Part B Call-In	N
PC011		Pre-Compliance Certification Submitted Y	Y
PC012		Pre-Compliance Certification Review Comp	Y
PC013		Notification of Compliance Testing	Y
PC014		Automatic Compliance Extension Requested	Y
PC020		Part B Received	N
	CR	Confidentiality Requested	
	CS	Confidentiality Substantiated	
	CU	Confidentiality Unsubstantiated	
PC021		Compliance Certification Submitted	N
PC022		Compliance Certification Review Completed	N
PC023		Request for Automatic Extension Granted	N
PC100		Notice Of Deficiency	N
PC110		Revisions Received	N
	CO	Complete	
	IN	Incomplete	
PC120		Waiver Requested	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
PC130		Waiver Public Notice - Intent To Approve	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
PC131		Waiver Public Notice - Intent To Deny	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
PC140		Waiver Request Approved	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
PC141		Waiver Request Denied	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
PC142		Waiver Request Withdrawn	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
PC150		Determined To Be Complete and Technically Adequate	N
PC160		Public Notice	N
	DP	DP Draft Permit Issued	
	ID	Intent To Deny	
PC170		Public Hearing	N
	IP	Informal Public	
	PN	Panel	
PC180		Received Withdrawal Request	
	DL	Delisted Waste	
	FC	Applicant Has Closed Or Intends To Close All Waste Handling Facilities	

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
	FE	Applicant Was A Protective Filer	
	LN	Applicant Has Gone Or Will Go To Less Than Ninety Day Storage	
	NW	Applicant Handles Or Will Handle Only Non-Regulated Waste	
	OT	Other Reason For Withdrawal	
	SQ	Applicant Has Become Or Will Become A Small Quantity Generator With Onsite Storage	
PC190		Withdrawal Request Determination	N
	AR	Approved Requested	
	DR	Denied Request	
PC200		Final Determination	
	PD	Permit Denied	
	PG	RCRA Permit Issued With HSWA Requirements, Corrective Action Schedule Not Necessary	
	PI	RCRA Permit Issued, HSWA Requirements Do Not Apply To This Facility	
	PJ	RCRA Permit Issued, With HSWA Requirements, Including a Schedule For Corrective Action	
	PP	Permit Issued By State, HSWA Requirements Apply But EPA Permit Covering HSWA has Not Been Issued	
PC205		Final Permit Effective	N
PC210		Determination Appealed	N
PC220		Appeal Settled	N
	DI	Decision Issued With No Remand	
	RC	Remand Proceedings Completed	
	RD	Review Of Decision	
PC230		Modification Requested	
	AC	Additional Capacity	
	AP	Additional Process	
	CA	Corrective Action Modification	
	GW	Groundwater Monitoring Modification	
	OH	Modification Other Than Groundwater	
PC231		Class Determination	N
	AI	Agency Initiated Mod	
	10	Class 1 Mod, No Prior Approval Required	
	11	Class 1 Mod, Prior Approval Required	
	20	Class 2 Mod	
	30	Class 3 Mod	
	MJ	Major (old classification still in use by some States)	
	MN	Minor (old classification still in use by some States)	
PC240		Modification Determination	
	AC	Additional Capacity	
	AP	Additional Process	
	BF	BIF Modification	
	CA	Corrective Action Modification	
	GW	Groundwater Monitoring Modification	
	MD	Modification Denied	
	OH	Modification Other Than Groundwater Monitoring Or Corrective Action	
	RW	Request Withdrawn	
PC242		Significance Determination	

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
	SI	Significant	
	NS	Not Significant	
PC245		Modification Denied	N
	AC	Additional Capacity	
	AP	Additional Process	
	BF	BIF Modification	
	CA	Corrective Action	
	GW	Groundwater Monitoring Modification	
	OH	Other	
PC250		Permit Reviewed	N
PC260		Permit Termination	N
PC270		Permit Expires	Y
PC310		Plan Received - Closure/Post-Closure	
	CL	Closure	
	PC	Post/Closure	
PC320		Notice of Deficiency - Closure/ Post-Closure Plan	N
PC330		Revisions Received - Closure/Post-Closure	N
	CL	Closure	
	PC	Post-Closure	
PC340		Public Notice - Closure/Post-Closure	N
	CL	Closure	
	PC	Post-Closure	
PC350		Public Hearing - Closure/Post-Closure	N
	CL	Closure	
	PC	Post-Closure	
PC360		Plan Approved – Closure/Post-Closure	
	ME	Final Closure	
	MF	Final Post-Closure	
	MO	Partial Closure	
	MP	Partial Post-Closure	
PC370		Receive Closure Certification	
	NO	Not According to Plan	
	PC	Post-Closure	
	YE	According to Plan	
PC380		Closure Verification	N
	AC	Acceptable Closure	
	UC	Unacceptable Closure	
PC381		Date Inspected To Confirm Post-Closure	N
PC390		Notice Of Deed Registry Received	N
PC401		Closure Notice Received N	N
PC402		Closure Plan Requested	N
PC404		Review of Closure/Post-Closure Plan Comp	N
PC405		Cost Estimated/Funding Adequate	N
PC408		First Decision Made	N
PC411		Closure Process Begun	N
PC413		Post-Closure Period Begun	N
PC415		Post-Closure Record of Waste Received	N
PC416		Post-Closure Period Completed	N
PC417		Facility Released from Closure Requirement	N

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
PC418		Facility Released From Post-Closure Requirements	N
Activity Track: Research, Development, and Demonstration (RD)			
RD001		Part A Received	N
	IS	Initial Submittal	
	CS	Request for Change under Interim Status	
	PB	Submitted with a Part B or Mod Request	
RD002		Part A Determination	N
	AK	Acknowledgement of Part A Receipt	
	VE	Verified by Inspection to Exist	
	AP	Approval of Interim Status Change	
	DR	Denied Request	
	IC	Part A Late, Interim Status Compliance Letter Issued	
RD003		Process Determination	N
	AD	Agency (State or EPA) Determination	
	FD	Facility Certified Document	
RD010		Part B Call-In	N
RD011		Pre-Compliance Certification Submitted Y	Y
RD012		Pre-Compliance Certification Review Completed	Y
RD013		Notification of Compliance Testing	Y
RD014		Case-by-Case Compliance Extension Requested	Y
RD016		Case-by-Case Compliance Extension Granted	Y
	AR	Approved Request	
	DR	Denied Request	
RD020		Part B Received	N
	CR	Confidentiality Requested	
	CS	Confidentiality Substantiated	
	CU	Confidentiality Unsubstantiated	
RD021		Notification of Automatic Extension	Y
RD022		Compliance Certification Submitted	Y
RD023		Compliance Certification Review Completed	Y
RD024		Compliance Extension Expires	Y
RD030		LTF Demo Plan Approved	N
RD040		LTF Demo Started	N
RD050		LTF Demo Completed	N
RD060		LTF Demo Results Received	N
RD080		Trial Burn Conducted	N
RD090		Trial Burn Results Received	N
RD100		Notice Of Deficiency	N
RD110		Revisions Received	N
	CO	Complete	
	IN	Incomplete	
RD120		Waiver Requested	
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
RD130		Waiver Public Notice - Intent To Approve	N

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
RD131		Waiver Public Notice - Intent To Deny	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
RD140		Waiver Request Approved	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
RD141		Waiver Request Denied	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
RD142		Waiver Request Withdrawn	N
	01	Double Liner Waiver	
	02	Surface Impoundment Retrofitting Waivers	
	03	Land Ban Petition Waivers	
	04	ACL Standards Waivers	
	05	Secondary Containment For Tanks Waiver	
	06	Groundwater Monitoring Waiver	
RD150		Determined To Be Complete and Technically Adequate	N
RD160		Public Notice	Y
	DP	Draft Permit Issued	
	ID	Intent To Deny	
RD170		Public Hearing	N
	IP	Informal Public	
	PN	Panel	
RD180		Received Withdrawal Request	
	DL	Delisted Waste	
	FC	Applicant Has Closed Or Intends To Close All Waste Handling Facilities	
	FE	Applicant Was A Protective Filer	
	LN	Applicant Has Gone Or Will Go To Less Than Ninety Day Storage	
	NW	Applicant Handles Or Will Handle Only Non-Regulated Waste	
	OT	Other Reason For Withdrawal	
	SQ	Applicant Has Become Or Will Become A Small Quantity Generator With	

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
		Onsite Storage	
RD190		Withdrawal Request Determination	N
	AR	Approved Requested	
	DR	Denied Request	
RD200		Final Determination	
	PD	Permit Denied	
	PG	RCRA Permit Issued With HSWA Requirements, Corrective Action Schedule Not Necessary	
	PI	RCRA Permit Issued, HSWA Requirements Do Not Apply To This Facility	
	PJ	RCRA Permit Issued, With HSWA Requirements, Including a Schedule For Corrective Action	
	PP	Permit Issued By State, HSWA Requirements Apply But EPA Permit Covering HSWA has Not Been Issued	
RD205		Final Permit Effective	N
RD210		Determination Appealed	N
RD220		Appeal Settled	N
	DI	Decision Issued With No Remand	
	RC	Remand Proceedings Completed	
	RD	Review Of Decision	
RD230		Modification Requested	
	AC	Additional Capacity	
	AP	Additional Process	
	CA	Corrective Action Modification	
	GW	Groundwater Monitoring Modification	
	OH	Modification Other Than Groundwater	
RD231		Class Determination	N
	AI	Agency Initiated Mod	
	10	Class 1 Mod, No Prior Approval Required	
	11	Class 1 Mod, Prior Approval Required	
	20	Class 2 Mod	
	30	Class 3 Mod	
	MJ	Major (old classification still in use by some States)	
	MN	Minor (old classification still in use by some States)	
RD240		Modification Determination	
	AC	Additional Capacity	
	AP	Additional Process	
	BF	BIF Modification	
	CA	Corrective Action Modification	
	GW	Groundwater Monitoring Modification	
	OH	Modification Other Than Groundwater Monitoring Or Corrective Action	
RD242		Significance Determination	
	SI	Significant	
	NS	Not Significant	
RD245		Modification Denied	N
	AC	Additional Capacity	
	AP	Additional Process	
	BF	BIF Modification	
	CA	Corrective Action	

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
	GW	Groundwater Monitoring Modification	
	MD	Modification Denied	
	OH	Modification Other Than Groundwater Monitoring Or Corrective Action	
	RW	Request Withdrawn	
RD250		Permit Reviewed	N
RD260		Permit Termination	N
RD270		Permit Expires	Y
RD370		Receive Closure Certification	N
	NO	Not According to Plan	
	PC	Post-Closure	
	YE	According to Plan	
RD380		Closure Verification	N
	AC	Acceptable Closure	
	UC	Unacceptable Closure	
RD381		Date Inspected To Confirm Post-Closure	N
RD390		Notice Of Deed Registry Received	N
RD403		Application Reviewed for Completeness	N
RD407		Project Decision Schedule Issued	N
RD408		Trial Burn Plan Submitted	N
RD409		Trial Burn Plan Reviewed	N
RD412		Trial Burn Results Review Completed	N
RD414		Public Notice Issued for Hearing	N
RD421		Permit Revoked and Reissued	N
RD423		Permit Transferred	N
RD424		Evidentiary Hearing Requested	N
RD425		Evidentiary Hearing Granted/Denied	N
RD426		Public Notice Issued/Evidentiary	N
RD427		Evidentiary Hearing Held	N
RD428		Presiding Officer's Decision issued	N
RD429		Presiding Officer's Decision Appealed	N
RD431		Judicial Review Requested	N
RD434		Permit Application Referred to Auth State	N
RD435		Permit Application Undergoing Full Permit	N
RD439		Facility Management Plan Screen	N
RD440		Facility Management Plan Reviewed	N
RD441		HSWA Information Requested	N
RD442		Regionally Defined Field	N
RD443		Exposure Information Received	N
RD444		Exposure Information Reviewed	N
RD445		Exposure Information Referred for Health	N
RD446		Previously Non-Regulated RCRA Solid Waste Management Units	N
RD447		Solid Waste Mgmt Units Verified	N
RD448		Releases Identified by Facility	N
RD449		Releases Verified by the Agency	N
RD450		Certification Compliance with Groundwater	N
RD451		Regionally Defined Field	N
RD452		Regionally Defined Field	N
RD453		Regionally Defined Field	N
RD454		RCRA Facility Assessment	N

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
RD455		Remedial Investigation Imposed	N
RD456		Remedial Invert Plan Received/Developed by EPA/State	N
RD457		Remedial Investigation Plan Approved via Permit	N
RD458		Corrective Measures Decision Made	N
RD459		Corrective Measures Plan Approved	N
RD460		Corrective Measures Plan Completed	N
RD461		Financial Assurance Mech for Correct Act	N
RD462		FAC Notified of Determination Compliance	N
RD463		Groundwater Monitoring Program Developed	N
RD464		Regionally Defined	N
RD465		Regionally Defined	N
RD466		Interim Measures Required	N
RD467		Interim Measures Completed	N
RD476		Reserved for Future Use	N
RD477		Reserved for Future Use	N
RD478		Reserved for Future Use	N
RD479		Reserved for Future Use	N
RD480		Regionally Defined	N
Activity Track: Corrective Action Events (CA)			
CA000		User Defined Event	
CA010		RFA Initiation	
CA050		RFA Completed	Y
CA060		Notice of Contamination	Y
CA070		Determination of Need For a RFI	Y
CA075		CA Prioritization	Y
CA100		RFI Imposition	Y
CA110		RFI Workplan Received	
CA120		RFI Workplan Modification Requested by Agency	
CA140		RFI Workplan Notice of Deficiency Issued	
CA150		RFI Workplan Approved	Y
CA155		RFI Supplemental Information Requested by Agency	
CA160		RFI Supplemental Information Received	
CA170		RFI Supplemental Information Deemed Satisfactory	
CA180		RFI Implementation Begun	
CA190		RFI Report Received	
CA195		RFI Progress Reports Received	
CA200		RFI Approved	Y
CA210		Referred To A Non-RCRA Authority	Y
CA225		Stabilization Measures Evaluation	Y
CA250		CMS Imposition	
CA260		CMS Workplan Received	
CA270		CMS Workplan Modification Requested By Agency	
CA300		CMS Workplan Approved	Y
CA305		CMS Supplemental Info Requested By Agency	
CA310		CMS Supplemental Information Received	
CA320		CMS Supplement Information Deemed Satisfactory	
CA330		CMS Implementation Begun	
CA340		CMS Report Received	
CA345		CMS Progress Reports Received	

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
CA350		CMS Approved	Y
CA370		Petition For No Further Action Receipt Date	
CA375		Decision On Petition For No Further Action	
CA380		Date For Public Notice On Proposed Remedy	
CA400		Date For Remedy Selection (CM Imposed)	Y
CA410		Date To Submit Remedy Design	
CA450		Corrective Measures Design Approved	Y
CA460		Cost Estimate For Remedy Received	
CA470		Financial Assurance For Remedy Demo	
CA500		CMJ Workplan Approved	Y
CA510		Determination Of Technical Impracticability	Y
CA550		Certification Of Remedy Completion (CMI)	Y
CA600		Stabilization Measures Implemented	Y
CA650		Stabilization Construction Completed	Y
CA725		Human Exposures Controlled Determination	Y
CA750		Release To GW Controlled Determination	Y
CA999		CA Process Is Terminated	Y
Activity Track: Enforcement Events (CE)			
CE110		Verbal Informal	Y
CE120		Written Informal	Y
CE190		Combination-Informal	Y
CE210		Initial 3008(A) Compliance Order	Y
CE220		Initial Imminent Hazard Order	Y
CE230		Initial Monitoring, Analysis, Test Order	Y
CE240		Initial 3008(H) I.S. CA Orders (Non-HSWA)	Y
CE250		Notice Of Non-Compliance	Y
CE290		Combination-Initial Formal	Y
CE310		Final 3008(A) Compliance Order	Y
CE320		Final Imminent Hazard Order	Y
CE330		Final Monitoring, Analysis, Test Order	Y
CE340		Final 3008(H) I.S. CA Orders (Non-HSWA)	Y
CE350		Federal Facility Compliance Agreement	Y
CE360		CERCLA 106 Order	Y
CE370		CERCLA 104 Order	Y
CE390		Combination-Final Formal	Y
CE410		Referral To AG	Y
CE420		Referral To DOJ	Y
CE430		Referral To DA/CA	Y
CE490		Combination-Judicial Referral	Y
CE510		Civil Action For Compliance	Y
CE520		Civil Action For Imminent Hazards	Y
CE530		Civil Action For Compliance With Previously Issued Action	Y
CE540		Civil Action For Interim Corrective Action	Y
CE550		Civil Action For Monetary Penalties	Y
CE590		Combination-Civil Actions	Y
CE610		Consent Decrees	Y
CE620		Judicial Orders	Y
CE710		Criminal Actions	Y
CE810		State To EPA	Y

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
CE820		EPA To State	Y
CE830		EPA RCRA To EPA CERCLA	Y
CE850		Federal Facility Referral To EPA HQ	Y
CE890		Combination-Admin. Referral	Y
Activity Track: CM&E Inspection Events(CM)			
CMCAO		Corrective Action Oversight	Y
CMCAV		Compliance Assistance Activity	Y
CMCDI		Case Development Inspection	Y
CMCEI		Compliance Evaluation Inspection On-Site	Y
CMCES		CEI Without Substantial Sampling (CES)	Y
CMCME		Compliance (GW) Monitoring Evaluation	Y
CMCMS		CME Without Substantial Sampling (CMS)	Y
CMCSE		Compliance Schedule Evaluation	Y
CMFRR		Financial Record Review	Y
CMFSD		Facility Self Disclosure	Y
CMLBN		Land Restriction Component	Y
CMMMB		RCRA CEI Performed With Screening Checklist	Y
CMMMCC		Comprehensive & Coordinated Inspection With CEI	Y
CMMMMD		Detailed Multimedia Inspection With CEI	Y
CMMMS		Multimedia Screening Checklist Only	Y
CMNRR		Non-Financial Record Review	Y
CMOAM		Operation And Maintenance Inspection	Y
CMOTH		Other Evaluation	Y
CMSNN		Determined Not To Be A Significant Non-Complier	Y
CMSNY		Determined To Be A Significant Non-Complier	Y
CMSPL		Sampling Inspection	Y
Activity Track: FMP Events (FM)			
FM010		Draft FMP	
FM020		Final FMP Approval	
FM030		Periodic FMP Update	
FM040		Immediate FMP Update	
FM050		Closeout - No Longer RCRA Regulated	
FM060		Closeout - Becomes CERCLA Site	
FM070		Closeout - Other	
Activity Track: Program Management (PM)			
PM011		TSF - Permit Track	
PM012		TSF - Closure Track	
PM021		LDF - Permit Track	
PM022		LDF - Closure Track	
PM031		Combustion - Permit Track	
PM032		Combustion - Closure Track	
PM101		High Environmental Priority	Y
PM102		Medium Environmental Priority	Y
PM103		Low Environmental Priority	Y
PM110		Submit Draft Permit Strategy	
PM120		Submit Final Permit Strategy	
PM130		Submit Final List Of Targets For Public	
PM210		Reports Of International Hazardous Waste Shipments	
PM220		Participate In Monthly Mgmt Meetings	

Permit Event Activity Track / Event Code / Status Code Table			
Event Code	Event Status	Description	Core?
PM230		Submit Training Plan	
PM240		Provide FY__ Inventory Of Acct Property	
PM250		Provide FY__ Final Financial Status Report	
PM260		Provide FY__ Equipment List	
PM270		Provide Cash Transaction Reports	
PM280		Provide FY__ WY And Funds Utilized Report	
PM310		Submit QA Status Report	
PM320		Submit Updated Program Plan	
PM410		Submit Changes To Authorized Program	
PM420		Inform EPA Of Proposed Changes To Program	
PM510		Submit Renewal Of Inter-Agency Agreement	

Appendix J

SEP/Enforcement Milestone Code (POLLPRE)

SEP/Enforcement Milestone Code (POLLPRE) values:

- ECA Environmental Compliance Audits.** These audits are an independent evaluation of a defendant/respondent's compliance status with environmental requirements.
- ECP Environmental Compliance Promotion.** A project that involves the dissemination of information, or the providing of training or technical support, to a regulated party or to some or all members of the defendant/respondent's economic sector to: 1) achieve and maintain compliance with regulatory requirements; 2) determine what are its regulatory requirements and thereby avoid committing a violation; or 3) go beyond compliance by reducing the generation, release, or disposal of pollutants beyond legal requirements.
- EMA Environmental Management Systems Audits.** These audits are an independent evaluation of a party's environmental policies, practices, and controls.
- EPE Environmental Public Awareness.** Projects that are publications, broadcasts, or seminars that underscore for the regulated community the importance of complying with environmental laws or disseminate technical information about the means of complying with environmental laws. (No longer a valid code for new SEPs. See Note under Comments.)
- EPP Emergency Planning and Preparedness.** An emergency planning and preparedness project is one where a defendant/respondent provides assistance, such as computers and software, telephone/radio communications systems, chemical emission detection and inactivation equipment, HAZMAT equipment, or training for first responders to chemical emergencies, to a responsible state or local planning entity.
- ERE Environmental Restoration.** A project that goes beyond repairing the damage caused by the violations to enhance the condition of the environment adversely affected.
- PHE Public Health.** A project that provides diagnostic, preventive, and/or remedial components of human health care that is related to the actual or potential damage to human health caused by the violation.
- PPA Pollution Prevention Assessments** are systematic, internal reviews of specific processes and operations designed to identify and provide information about

opportunities to reduce the use, production, and generation of toxic and hazardous materials and other wastes.

PPE Pollution Prevention. A project that reduces the generation of pollution through 'source reduction', i.e., any practice that reduces the amount of any hazardous substance, pollutant, or contaminant entering any waste stream or otherwise being released into the environment prior to recycling, treatment, or disposal. If the pollutant or waste stream has been generated, pollution prevention is no longer possible and the waste must be handled by appropriate recycling, treatment, or disposal methods. Pollution prevention can be accomplished by: 1) Equipment/technology modifications; 2) Process or procedure modifications; 3) Product reformulation/redesign; 4) Raw materials substitution; 5) Improved housekeeping/O&M/training/ inventory control; 6) In-process recycling; 7) Energy efficiency/conservation; 8) Other.

PRE Pollution Reduction. A project that results in a decrease in the amount or toxicity of any hazardous substance, pollutant, or contaminant entering any waste stream or otherwise being released into the environment by a means that does not qualify as 'pollution prevention'.

SAA Site Assessments. These assessments are investigations of the condition of the environment at a site, or of the environment impacted by a site, and/or investigations of threats to human health or the environment relating to a site.

Other program-specific SEP.

These SEP codes will be Implementer defined and will not be sent to Oversight. There will be no National reporting of these SEPs.

Appendix K

Process Code (PUPROC)

Process Code (PUPROC) codes:

Process Code (PUPROC)	
Code	Description
D79	Underground Injection Well Disposal
D80	Landfill
D81	Land Application
D82	Ocean Disposal
D83	Surface Impoundment Disposal
D99	Other Disposal
S01	Container
S02	Tank Storage
S03	Waste Pile
S04	Surface Impoundment Storage
S05	Drip Pad
S06	Containment Building - Storage
S99	Other Storage
T01	Tank Treatment
T02	Surface Impoundment Treatment
T03	Incinerator
T04	Other Treatment
T80	Boiler
T81	Cement Kiln
T82	Lime Kiln
T83	Aggregate Kiln
T84	Phosphate Kiln
T85	Coke Oven
T86	Blast Furnace
T87	Smelting, Melting, or Refining Furnace
T88	Titanium Dioxide Chloride Process Oxidation Reactor
T89	Methane Reforming Furnace
T90	Pulping Liquor Recovery Furnace
T91	Combustion Device Used in the Recovery of Sulfur Values from Spent Sulfuric Acid
T92	Halogen Acid Furnace
T93	Other Industrial Furnaces Listed in 40 CFR 260.10
T94	Containment Building - Treatment
X01	Open Burning/Open Detonation
X02	Mechanical Processing
X03	Thermal Unit
X04	Geologic Repository
X99	Other Subpart X

Appendix L

Process Unit of Measure (PUPROCU)

Process Unit of Measure (PUPROCU) codes:

Process Unit of Measure (PUPROCU)	
Code	Description
A	acre-feet
B	acres
C	cubic meters
D	short tons per hour
E	gallons per hour
F	hectare-meter
G	gallons
H	liters per hour
I	BTUs per hour
J	pounds per hour
L	liters
N	short tons per day
Q	hectares
R	kilograms per hour
S	metric tons per day
U	gallons per day
V	liters per day
W	metric tons per hour
X	millions of BTUs per hour
Y	cubic yards

Appendix M

Area of Evaluation/Violation (EVAREA/VAREA)

Area of Violation (VAREA) values:

Area of Evaluation/Violation (EVAREA/VAREA)	
Code	Description
BCE	BIF—Standards to Control Emissions
BDT	BIF—Standards for Direct Transfer
BIS	BIF—Interim Status Standards
BPS	BIF—Permit Standards
BRR	BIF—Standards for Regulation of Residue
CAS	TSD—Corrective Action Compliance Schedule
CSS	Compliance Schedule Violation
DCH	TSD—Chemical/Physical/Biological Requirements
DCL	TSD—Closure/Post-Closure Requirements
DFR	TSD—Financial Responsibility Requirements
DGW	TSD—Groundwater Monitoring Requirements
DIA	Incinerator—Waste Analysis
DIN	TSD—Incineration Requirements
DLB	TSD—Land Ban Requirements
DMI	Incinerator—Monitoring and Inspection
DOP	Incinerator—Operating Requirements
DOT	TSD—Other Requirements
CDP	TSD—Contingency Plan Requirements
DGS	TSD—General Standards
DLF	TSD—Landfill Requirements
DLT	TSD—Land Treatment Requirements
DMC	TSD—containers Requirements
DMR	TSD—Manifest Requirements
DOR	TSD—Other Requirements
DPB	TSD—Part B Application
DPP	TSD—Preparedness/Prevention Requirements
DSI	TSD—Surface Impoundments Requirements
DTR	TSD—Tanks Requirements
DWP	TSD—Waste Piles Requirements
DPS	Incinerator—Performance Standards
DTT	TSD—Thermal Treatment Requirements
FEA	Formal Enforcement Agreement
GER	Generator—All Requirements
GGR	Generator—General Requirements
GMR	Generator—Manifest Requirements
GOR	Generator—Other Requirements
GPT	Generator—Pre-Transport Requirements
GRR	Generator—Record Keeping Requirements
GSC	Generator—Special Conditions
GSQ	Generator—Small Quantity Generator Requirements
GLB	Generator—Land Ban Requirements
TRR	Transporter—All Requirements
TGR	Transporter—General Requirements

Area of Evaluation/Violation (EVAREA/VAREA)	
Code	Description
TMR	Transporter—Manifest/Record Keeping Requirements
TOR	Transporter—Other Requirements
TWD	Transporter—Hazardous Waste Discharges

Appendix N

Class of Violation (VCLASS)

Class of Violation (VCLASS) values:

Note: With the implementation of the revised Enforcement Response Policy (ERP), FY97, class is no longer a required field and its absence does not indicate anything regarding the severity of the violation.

Prior to FY97:

- 1** **Class 1.** Deviations from regulations, or provisions of compliance orders, consent agreements, consent decrees or permit conditions that could result in a failure to:
 - a) Assure that hazardous waste is destined for and delivered to authorized treatment, storage, or disposal facilities (TSDFs); or
 - b) Prevent releases of hazardous waste or constituents, both during the active and any applicable post-closure periods of the facility operation where appropriate; or
 - c) Assure early detection of such releases; or
 - d) Perform emergency clean-up operation or other corrective action for releases.
- 2** **Class 2.** Any violation of a RCRA requirement that does not meet the criteria above for Class 1 violations.
- P** **Class P.** The Violation File record represents a pending or potential violation subject to determination when lab sample results or legal determination becomes available. (see Schedule Response Date definition when Class of Violation is 'P').

Appendix O

Instrument Portmanteau Group Description

Instrument Portmanteau Group

The Instrument group in IDEA is comprised of four record types: Instrument records, Legal Authority records, Instrument Area records, and Corrective Action Event records. IDEA created the Instrument portmanteau group in order to convey the multi-level data hierarchy of the records. (IDEA is only capable of two levels of data hierarchy—portmanteaus allow IDEA to represent data with more than two levels of hierarchy.) In RCRIS, the Legal Authority, Instrument Area, and Corrective Action Event records are “offspring” groups while the Instrument records comprise the “parent” group.

Each of the record types share keyed fields and, in some cases, maintain their own unique keyed fields as well. Because key fields are required fields, it is possible to determine the record type by observing which key fields are present and which are absent. The table below lists the key fields that will appear for each record type. Additionally, there are non-keyed fields unique to each record type. However, as non-keyed fields are not required fields, record types may only be determined by the presence of a non-keyed field, but not by its absence.

Instrument Group		
Record Type	Keyed Elements	Non-Keyed Elements
Instrument	INST, IAGCY, IEDATE	IDATE, IRDATE, IPROG
Legal Authority	INST, IAGCY, IEDATE, ISTAT, ISEQ	
Instrument Area	INST, IAGCY, IEDATE, CAREA	ADESC
Corrective Action Event	INST, IAGCY, IEDATE, CAREA, IEMOD, IECODE, IEAGCY, ISEQ	IEADATE, IEPROG, IEVSTAT

Appendix P

Enforcement Portmanteau Group Description

Enforcement Portmanteau Group

The Enforcement group in IDEA is comprised of four record types: Enforcement Key Data records, SEP/Milestone Data records, Multimedia Action records, and Penalty data records. IDEA created the Enforcement portmanteau group in order to convey the multi-level data hierarchy of the records. (IDEA is only capable of two levels of data hierarchy—portmanteaus allow IDEA to represent data with more than two levels of hierarchy.) In RCRIS, the SEP/Milestone Data, Multimedia Action, and Penalty Data records are “offspring” groups while the Enforcement Key records comprise the “parent” group.

Each of the record types share keyed fields and, in some cases, maintain their own unique keyed fields as well. Because key fields are required fields, it is possible to determine the record type by observing which key fields are present and which are absent. The table below lists the key fields that will appear for each record type. Additionally, there are non-keyed fields unique to each record type. However, as non-keyed fields are not required fields, record types may only be determined by the presence of a non-keyed field, but not by its absence.

Enforcement Records		
Record Type	Keyed Elements	Non-Keyed Elements
Enforcement Key Data	CEENUM, ENFAGN, EDATE	ENFTYPE
SEP/Milestone Data	CEENUM, ENFAGN, EDATE, SEPSEQ	POLLPRE
Multimedia Action	CEENUM, ENFAGN, EDATE, MMCODE	
Penalty Data	CEENUM, ENFAGN, EDATE, EAMTTYP	EPENAMT

Appendix Q

Evaluation Portmanteau Group Description

Evaluation Portmanteau Group

The Evaluation group in IDEA is comprised of two record types: Evaluation Type records, and Evaluation Area records. The Evaluation Type records are the 'parent' records while the Evaluation Area records are the 'offspring'. For each Evaluation Type record, there may be multiple Evaluation Area records linked to it.

Each record type shares keyed fields as well as having their own unique keyed fields. Because key fields are required fields, it is possible to determine the record type by observing which key fields are present and which are absent. The table below lists the key fields that will appear for each record type. Additionally, there are non-keyed fields unique to each record type. However, as non-keyed fields are not required fields, record types may only be determined by the presence of a non-keyed field, but not by its absence.

Evaluation Group		
Record Type	Keyed Elements	Non-Keyed Elements
Evaluation Type	EVALNO, EVALAGN, EVALDTE	ETYPE
Evaluation Area	EVALNO, EVALAGN, EVALSEQ	EVAREA, CESTAT, CEMDESC

Appendix R

Violation Portmanteau Group Description

Violation Portmanteau Group

The Violation group in IDEA is comprised of three record types: Violation Data records, Evaluation Link records, and Enforcement Link records. IDEA created the Violation portmanteau group in order to convey the multi-level data hierarchy of the records. (IDEA is only capable of two levels of data hierarchy—portmanteaus allow IDEA to represent data with more than two levels of hierarchy.) In RCRIS, the Evaluation Link and Enforcement Link records are “offspring” groups while the Violation records comprise the “parent” group. The Evaluation Link and Enforcement Link records provide linkage between the violation data and inspection and enforcement data.

Each of the record types share keyed fields and, in some cases, maintain their own unique keyed fields as well. Because key fields are required fields, it is possible to determine the record type by observing which key fields are present and which are absent. The table below lists the key fields that will appear for each record type. Additionally, some records have non-keyed fields that are unique to that record type. However, as non-keyed fields are not required fields, record types may only be determined by the presence of a non-keyed field, but not by its absence.

Violation Group		
Record Type	Keyed Fields	Non-Keyed Fields
Violation Data	CEVVKEY	VAREA, VDTEDT, VCLASS, VACTDTE, VPRTY, VSCHDTE
Evaluation Link	CEVVKEY, EKEY, EKEYSEQ	
Enforcement Link	CEVVKEY, VENFKEY, EKEYSEQ	

Appendix S

Permit Sequence Portmanteau Group Description

Permit Sequence Portmanteau Group

The Permit Sequence group in IDEA is comprised of three record types: Permit records, Event Activity records, and Process records. IDEA created the Permit Sequence portmanteau group in order to convey the multi-level data hierarchy of the records. (IDEA is only capable of two levels of data hierarchy—portmanteaus allow IDEA to represent data with more than two levels of hierarchy.) In RCRIS, the Event Activity and Process records are “offspring” groups while the Permit records comprise the “parent” group. The Event Activity and Process records provide linkage between the permit data and events and processes data.

Each of the record types share keyed fields and, in some cases, maintain their own unique keyed fields as well. Because key fields are required fields, it is possible to determine the record type by observing which key fields are present and which are absent. The table below lists the key fields that will appear for each record type. Additionally, there are non-keyed fields unique to each record type. However, as non-keyed fields are not required fields, record types may only be determined by the presence of a non-keyed field, but not by its absence.

Permit Sequence Group		
Record Type	Keyed Elements	Non-Keyed Elements
Permit	PSQN	PAPP
Event Activity	PSQN, PECODE, PEAGY, PESEQ	PADATE, PESTAT
Process	PSQN, PECODE, PEAGY, PESEQ, UNITSEQ, UNITNAME, PUSEQ	PUPROC, PUPROCU, PUDATE, PCAP, PUTOT, COMMERC, OPSTAT, LEGSTAT

Attachment 1

RCRIS Data Elements (by data element name)

RCRIS Data Elements (by data element name)						
Element Name	Group	Index? (Y//N)	Enf. Sens? (Y/S/N)	Data Type	Length	Name
ADESC	INST	N	N	Char	40	Area Description
AIR	SRCE	N	N	Char	1	Air Transporter Indicator
BBL	SRCE	Y	N	Char	1	Burner/Blender Indicator
CADD	CONT	N	N	Char	1	Contact Address Code
CAREA (K)	INST	Y	N	Num	4	Area Code
CCITY	CONT	N	N	Char	25	Contact City
CDE	HNDLR	Y	N	Char	5	County Code
CEENUM (K)	ENFRC	Y	S	Char	11	Enforcement Control Number
CEMDESC	EVAL	N	S	Char	40	Description
CESTAT	EVAL	N	S	Char	2	Evaluation (Coverage) Status
CEVVKEY (K)	VIOL	Y	S	Char	5	Violation Control Number
CFIRST	CONT	N	N	Char	15	Contact First Name
CLAST	CONT	N	N	Char	15	Contact Last Name
COCITY	OWNR	N	N	Char	25	Owner/Operator City
COIND	OWNR	N	N	Char	2	Owner/Operator Indicator
COMMERC	PSEQ	N	N	Char	1	Accepts Third Party Hazardous Waste
CONAME	OWNR	N	N	Char	40	Owner/Operator Name
CONTTYP (K)	CONT	Y	N	Char	1	Contact Type
COPHONE	OWNR	N	N	Char	10	Owner/Operator Phone
COREID	HNDLR	N	N	Char	1	Send to Merge Database Flag
COSTATE	OWNR	N	N	Char	2	Owner/Operator State
COSTRT	OWNR	N	N	Char	30	Owner/Operator Street
COTYPE	OWNR	Y	N	Char	2	Type of Owner/Operator
CPHONE	CONT	N	N	Char	10	Contact Phone
CPVIOL	HNDLR	Y	N	Char	1	Significant Violation Flag
CPVIOL2	HNDLR	Y	N	Char	1	Alternate Significant Violation Flag
CSTATE	CONT	N	N	Char	2	Contact State
CSTRT1	CONT	N	N	Char	30	Contact Street 1
CSTRT2	CONT	N	N	Char	30	Contact Street 2
CTITLE	CONT	N	N	Char	15	Contact Title
CZIP	CONT	N	N	Num	5	Contact Zip Code
EADATE	ORPH	N	N	Num	9	Actual Date
EAGCY (K)	ORPH	Y	N	Char	1	Responsible Agency
EAMTTYP (K)	ENFRC	Y	S	Char	2	Penalty Type Code
ECODE (K)	ORPH	Y	N	Char	5	Event Code
EDATE (K)	ENFRC	Y	S	Num	9	Enforcement Action Date
EKEY (K)	VIOL	Y	S	Char	12	Related Evaluation Key
EKEYSEQ (K)	VIOL	N	S	Num	4	Sequence Number
EMOD (K)	ORPH	Y	N	Char	1	Event Module
ENFAGN (K)	ENFRC	Y	S	Char	1	Responsible Agency
ENFTYPE	ENFRC	Y	S	Char	3	Enforcement Action Type
EPENAMT	ENFRC	Y	S	Num	8	Penalty Assessed
EPROG	ORPH	N	N	Char	1	Responsible Program
ESEQ (K)	ORPH	N	N	Num	4	Event Sequence Number
ETYPE	EVAL	Y	S	Char	3	Evaluation Type
EVALAGN (K)	EVAL	Y	S	Char	1	Responsible Agency
EVALDTE (K)	EVAL	Y	S	Num	9	Evaluation Date
EVALNO (K)	EVAL	Y	S	Char	11	Evaluation Number
EVALSEQ (K)	EVAL	Y	S	Num	4	Evaluation Sequence: Generated
EVAREA	EVAL	Y	S	Char	3	Area of Evaluation
EVSTAT	ORPH	N	N	Char	2	Event Status
GEN	SRCE	Y	N	Char	2	Generator Indicator

RCRIS Data Elements (by data element name)						
Element Name	Group	Index? (Y//N)	Enf. Sens? (Y/S/N)	Data Type	Length	Name
HACCESS	HNDLR	N	N	Char	1	Handler Accessibility Indicator (Bankruptcy Indicator)
HASH	HNDLR	Y	N	Char	100	Handler Hash Name
HASHSEL	HNDLR	Y	N	Char	4	Hash Name Index
HBOYSNC	HNDLR	Y	N	Char	1	Beginning of Year Significant Non-Complier Indicator
HCAS	HNDLR	Y	N	Char	1	Corrective Action Compliance Flag
HCDATE	OWNR	N	N	Num	9	Previous Owner/Operator Date
HCOSEQ (K)	OWNR	N	N	Num	4	Owner/Operator Sequence Number
HDCL	HNDLR	Y	N	Char	1	Closure/Post Closure Requirements Violation Flag
HDFR	HNDLR	Y	N	Char	1	Financial Requirements Violation Flag
HDGW	HNDLR	Y	N	Char	1	Groundwater Requirements Violation Flag
HDLB	HNDLR	Y	N	Char	1	TSD Landban Regulations Violation Flag
HDOT	HNDLR	Y	N	Char	1	Other TSD Regulations Violation Flag
HENF	HNDLR	Y	N	Char	1	Formal Enforcement Agreement Violation Flag
HEXDATE	HNDLR	N	N	Num	9	Existence Date
HGER	HNDLR	Y	N	Char	1	General Requirements Violation Flag
HGLB	HNDLR	Y	N	Char	1	Generator Landban Regulations Violation Flag
HIGHWAY	SRCE	N	N	Char	1	Highway Transporter Indicator
HINC	HSCN	Y	N	Char	2	Historical NC Indicator
HISNC	HSCN	Y	N	Char	2	Historical SNC Indicator
HMONTH (K)	HSCN	Y	N	Num	6	Month and Year of SNC (MMYYYY)
HOFFSIT	HNDLR	N	N	Char	1	Off Site Waste Receipt
HREGN	HNDLR	Y	N	Char	2	Region Code
HSNC	HNDLR	Y	N	Char	1	Significant Non-Complier Indicator
HTRR	HNDLR	Y	N	Char	1	Transporter Requirements Violation Flag
HUCAWR	HNDLR	Y	N	Char	4	Corrective Action Workload Universe
HUCESQG	HNDLR	Y	N	Char	1	Conditionally Exempt Small Quantity Generator
HUFUL	HNDLR	Y	N	Char	1	Fully Regulated Large Quantity Generator (LQG) Universe
HUINCIN	HNDLR	Y	N	Char	1	Incinerator Universe
HULAND	HNDLR	Y	N	Char	1	Land Disposal Universe
HUPCLWR	HNDLR		N	Char	4	Closure Workload Universe
HUPMTPR	HNDLR	Y	N	Char	4	Permitting/Closure/Post-Closure Progress Universe
HUPMTWR	HNDLR	Y	N	Char	4	Permit Workload Universe
HUPPCWR	HNDLR	Y	N	Char	4	Post-Closure Workload Universe
HUSJCA	HNDLR	Y	N	Char	4	TSD Subject to Corrective Action Universe
HUSJCEI	HNDLR	Y	N	Char	4	TSD Subject to CEI Universe
HUSJCES	HNDLR	Y	N	Char	1	HUSJCEI Index
HUSML	HNDLR	Y	N	Char	1	Small Quantity Generator Universe
HUSTORT	HNDLR	Y	N	Char	1	Storage/Treatment Universe
HUTRAN	HNDLR	Y	N	Char	1	Transporter Universe
HUWRKLD	HNDLR	Y	N	Char	1	HUSJCEI, HUPMTPR, HUPMTWR, HUPCLWR, HUPPCWR Index
HWF1	SRCE	N	N	Char	1	Market to Burner Indicator
HWF2	SRCE	N	N	Char	1	Other Market Indicator
HWF3	SRCE	N	N	Char	1	Burner Indicator
IAGCY (K)	INST	Y	N	Char	1	Responsible Agency
ID	ID	Y	N	Char	12	Handler ID Number
IDATE	INST	N	N	Num	9	Instrument Issue Date
IEADATE	INST	N	N	Num	9	Actual Date
IEAGCY (K)	INST	Y	N	Char	1	Responsible Agency
IECODE (K)	INST	Y	N	Char	5	Event Code
IEDATE (K)	INST	Y	N	Num	9	Instrument Effective Date
IEMOD (K)	INST	Y	N	Char	1	Event Module
IEPROG	INST	N	N	Char	1	Responsible Program

RCRIS Data Elements (by data element name)						
Element Name	Group	Index? (Y//N)	Enf. Sens? (Y/S/N)	Data Type	Length	Name
IEVSTAT	INST	N	N	Char	2	Event Status
INSPDAY	HNDLR	Y	N	Num	5	Days Since Last Inspection
INST (K)	INST	Y	N	Char	1	Type of Instrument
I PROG	INST	N	N	Char	1	Responsible Program
IRDATE	INST	N	N	Num	9	Instrument Revocation Date
ISEQ (K)	INST	N	N	Num	4	Sequence Number
ISTAT (K)	INST	Y	N	Char	1	Legal Authority Code
LANDTYP	HNDLR	Y	N	Char	1	Type of Land
LATD	HNDLR	N	N	Num	6	Site Latitude
LCITY	HNDLR	N	N	Char	25	Location City
LEGSTAT	PSEQ	Y	N	Char	2	Process Unit Group Legal Status
LLSRC	HNDLR	N	N	Char	1	Latitude/Longitude Source
LOCST1	HNDLR	N	N	Char	30	Location Street 1
LOCST2	HNDLR	N	N	Char	30	Location Street 2
LONG	HNDLR	N	N	Num	6	Site Longitude
LSTATE	HNDLR	Y	N	Char	2	Location State
LZIP	HNDLR	Y	N	Num	5	Location Zip Code
MAILST1	HNDLR	N	N	Char	30	Mailing Street 1
MAILST2	HNDLR	N	N	Char	30	Mailing Street 2
MCITY	HNDLR	N	N	Char	25	Mailing City
MMCODE (K)	ENFRC	Y	S	Char	3	Multimedia Action Code
MSTATE	HNDLR	Y	N	Char	2	Mailing State
MZIP	HNDLR	N	N	Num	5	Mailing Zip Code
NAME	HNDLR	N	N	Char	40	Handler Name
NOTIF	HNDLR	Y	N	Char	1	Non-Notifier Code
OPSTAT	PSEQ	Y	N	Char	2	Process Unit Group Operating Status
OTHER	SRCE	N	N	Char	20	Other Transportation Indicator
OUO1	SRCE	N	N	Char	1	Used Oil Fuel Marketer to Burner Indicator
OUO2	SRCE	N	N	Char	1	Used Oil Fuel Other Marketer
OUO3	SRCE	N	N	Char	1	Used Oil Fuel Burner Indicator
PADATE	PSEQ	N	N	Num	9	Actual Date of Event
PAPP	PSEQ	N	N	Char	12	Permit Processing Number
PCAP	PSEQ	N	N	Num	8	Process Design Capacity
PEAGY (K)	PSEQ	Y	N	Char	1	Event Responsible Agency
PECODE (K)	PSEQ	Y	N	Char	5	Activity Tracking/Event Code
PESEQ (K)	PSEQ	N	N	Num	4	Event Sequence Number
PESTAT	PSEQ	Y	N	Char	2	Event Status Code
POLLPRE	ENFRC	Y	S	Char	3	SEP/Enforcement Milestone Code
PSQN (K)	PSEQ	Y	N	Num	4	Permit Sequence Number
PSTAT	PSEQ	Y	N	Char	7	Event Code and Status
PUDATE	PSEQ	N	N	Num	9	Date Process Effective
PUPROC	PSEQ	Y	N	Char	3	Current TSD Process
PUPROCU	PSEQ	Y	N	Char	1	Unit of Measure for Design Capacity
PUSEQ (K)	PSEQ	N	N	Num	3	Process Detail Records Sequence Number
PUTOT	PSEQ	N	N	Num	9	Number of Units Within Unit Group
RAIL	SRCE	N	N	Char	1	Rail Transporter Indicator
RCRADBB	SRCE	N	N	Char	2	Burner/Blender RCRA Regulatory Status Description
RCRADGE	SRCE	N	N	Char	2	Generator RCRA Regulatory Status Description
RCRADTR	SRCE	N	N	Char	2	Transporter RCRA Regulatory Status Description
RCRADTS	SRCE	N	N	Char	2	TSD RCRA Regulatory Status Description
RCRASBB	SRCE	N	N	Char	1	Burner/Blender RCRA Regulatory Status
RCRASGE	SRCE	N	N	Char	1	Generator RCRA Regulatory Status
RCRASTR	SRCE	N	N	Char	1	Transporter RCRA Regulatory Status

RCRIS Data Elements (by data element name)						
Element Name	Group	Index? (Y//N)	Enf. Sens? (Y/S/N)	Data Type	Length	Name
RCRASTS	SRCE	N	N	Char	1	TSD RCRA Regulatory Status
RECDATE (K)	SRCE	Y	N	Num	9	Receipt Date
SEPSEQ (K)	ENFRC	N	S	Num	2	SEP/Enforcement Milestone Sequence Number
SICCODE	SICC	Y	N	Num	4	Standard Industrial Classification (SIC) Code
SICPRIM	SICC	N	N	Char	1	SIC Code Primary Indicator
SICSEQ (K)	SICC	N	N	Num	4	SIC Code Sequence Number
SICSRCE	SICC	N	N	Char	1	SIC Code Source
SNCMTH2	HNDLR	Y	N	Num	2	Alternate Number of Months in SNC Violation
SNCMTHS	HNDLR	Y	N	Num	2	Number of Months in SNC Violation (past two years)
SOURCE (K)	SRCE	Y	N	Char	1	Source of Information
SUO	SRCE	N	N	Char	1	Specification Used Oil Fuel Marketer
TRANS	SRCE	Y	N	Char	1	Transporter Indicator
TSD	SRCE	Y	N	Char	1	Treater/Storer/Disposer (TSD) Indicator
UIC	SRCE	N	N	Char	1	Underground Injection Control Indicator
UNITNAM (K)	PSEQ	Y	N	Char	18	Process Unit Group Name
UNITSEQ (K)	PSEQ	N	N	Num	4	Process Unit Group Sequence Number
UTIL1	SRCE	N	N	Char	1	Utility Boiler Indicator
UTIL2	SRCE	N	N	Char	1	Industrial Boiler Indicator
UTIL3	SRCE	N	N	Char	1	Industrial Furnace Indicator
VACTDTE	VIOL	Y	S	Num	4	Actual Resolved Date
VAREA	VIOL	Y	S	Char	3	Area of Violation
VCLASS	VIOL	Y	S	Char	1	Class of Violation
VDTEDET	VIOL	Y	S	Num	4	Date Violation Determined
VENFKEY (K)	VIOL	Y	S	Char	12	Enforcement Action
VIOLQTR	HNDLR	Y	N	Num	2	Number of Quarters in Violation (past two years)
VIOLQTR2	HNDLR	Y	N	Num	2	Alternate Number of Quarters in Violation
VPRTY	VIOL	Y	S	Char	1	Priority Indicator
VSCHDTE	VIOL	Y	S	Num	4	Schedule Resolved Date
WATER	SRCE	N	N	Char	1	Water Transporter Indicator
XREFID	HNDLR	N	N	Char	12	Previous ID Number
ZIPCODE	OWNR	N	N	Num	5	Owner/Operator Zip Code